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 ADMARKETPLACE INC.



UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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ADMARKETPLACE INC.,	:
	:
Plaintiff,	:
	:
v.	: Civil Case No.
	:
TEE SUPPORT, INC. A/K/A TEE SUPPORT,	:
TEESUPPORT and TEESUPPORT INC.; QIWANG	: COMPLAINT
COMPUTER LTD. D/B/A TEE SUPPORT; GUANGXI	:
NANNING QIWANG COMPUTER LTD. D/B/A TEE	:
SUPPORT; JOHN DOE 1 A/K/A MARK ANDERSON;	: PLAINTIFF DEMANDS
JOHN DOE 2 A/K/A LUO GANG; JOHN DOE 3	: TRIAL BY JURY
A/K/A SARAH and SARAH MOCK; JOHN DOE 4	:
A/K/A CINDY MOORE; and JOHN DOE 5 A/K/A	:
JOLIN,	:
	:
Defendants.	:
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Plaintiff. adMarketplace Inc. ("Plaintiff" or "adMarketplace"), by its attorneys, ROONEY P.C., as and for its Complaint against Defendants Tee Support, Inc. A K A Tee Support, TeeSupport and TeeSupport Inc.; Qiwang Computer Ltd. D/B/A Tee Support; Guangxi Nanning Qiwang Computer Ltd. D/B/A Tee Support; John Doe 1 A/K/A Mark Anderson; John Doe 2 A/K/A Luo Gang; John Doe 3 A/K/A Sarah and Sarah Mock; John Doe 4 A/K/A Cindy Moore; and John Doe 5 A/K/A Jolin (collectively, "Defendants"), alleges as follows, upon

knowledge with respect to itself and its own acts, and upon information and belief as to all other matters:

### **JURISDICTION AND VENUE**

1. This action arises under the federal Trademark Act of 1946, 15 U.S.C. § 1051 *et seq.* (the “Lanham Act”), as amended, and related state statutes and the common law.

2. This Court has subject matter jurisdiction under Section 39 of the Lanham Act, 15 U.S.C. § 1121, and 28 U.S.C. § 1331, §§ 1338(a) and (b). This Court also has supplemental jurisdiction over all state law and common law claims pursuant to 28 U.S.C. § 1367(a) because the state law claims are so related to the federal trademark claims that they form part of the same case or controversy, and under principles of pendent jurisdiction.

3. This Court has personal jurisdiction over Defendants by virtue of Defendants’ business activities and specific contacts with the State of New York relating to the acts alleged herein and pursuant to the long arm statutes for the State of New York and also, or in the alternative, pursuant to Rule 4(k)(2) of the Federal Rules of Civil Procedure.

4. Venue is proper pursuant to 28 U.S.C. §§ 1391(b) and (c) because, upon information and belief, Defendants are doing and transacting business in this Judicial District; Defendants have substantial contacts with this Judicial District; a substantial portion of the events at issue have arisen and continue to occur in this Judicial District; and Defendants have committed the tortious acts complained of herein in this Judicial District, among others.

### **PARTIES**

5. Plaintiff is a corporation organized under the laws of the State of Delaware, with its principal place of business located at 3 Park Ave, 27<sup>th</sup> Floor, New York, NY 10016.

6. Upon information and belief, Defendant Tee Support, Inc. is a corporation organized under the laws of the People's Republic of China, with its corporate offices located at Floor #4, Diwang International Commerce Center, Nanning City, Guangxi, People's Republic of China 530003. Upon information and belief, Defendant Tee Support, Inc. is also known as Tee Support, TeeSupport, and TeeSupport, Inc.

7. Upon information and belief, Defendant Qiwang Computer Ltd. D/B/A Tee Support (also known as TeeSupport) is a company organized under the laws of the People's Republic of China, with its office located at Keyuan Dadao Kechuang Dasha 626, Nanning, Guangxi, People's Republic of China 530003.

8. Upon information and belief, Defendant Guangxi Nanning Qiwang Computer Ltd. D/B/A Tee Support (also known as TeeSupport) is a company organized under the laws of the People's Republic of China, with its office located at Keyuan Dadao Kechuang Dasha 626, Nanning, Guangxi, People's Republic of China 530003.

9. Upon information and belief, Defendant John Doe 1, an individual or entity whose actual name is unconfirmed, is one of the registrants of the domain name [teesupport.com](http://teesupport.com).

10. Upon information and belief, Defendant John Doe 1 has used the name Mark Anderson. Upon information and belief, Defendant John Doe 1 is, directly and/or indirectly, engaged in, and/or is directing, controlling, ratifying, facilitating, promoting, or otherwise participating in, the advertisement, promotion, sale, distribution, and supply of services under the name(s) TEE SUPPORT, INC., TEESUPPORT INC., TEE SUPPORT and/or TEESUPPORT (collectively referred to herein as "TEESUPPORT"), and/or benefits financially from the sale of services under the name TEESUPPORT, as set forth herein, but whose identity, actual name, address and telephone number is unconfirmed or presently unknown.

11. Upon information and belief, Defendant John Doe 2 is an individual or entity whose actual name is unconfirmed.

12. Upon information and belief, Defendant John Doe 2 has used the name Luo Gang and has used the title President. Upon information and belief, Defendant John Doe 2 is, directly and/or indirectly, engaged in, and/or is directing, controlling, ratifying, facilitating, promoting, or otherwise participating in, the advertisement, promotion, sale, distribution, and supply of services under the name TEESUPPORT, and/or benefits financially from the sale of services under the name TEESUPPORT, as set forth herein, but whose identity, actual name, address and telephone number is unconfirmed or presently unknown.

13. Upon information and belief, Defendant John Doe 3 is an individual or entity whose actual name is unconfirmed.

14. Upon information and belief, Defendant John Doe 3 has used the name Sarah and Sarah Mock and has authored advertisements for services for TEESUPPORT at the website located at <http://removevirustool.blogspot.com>. See, for example, the August 21, 2012 Ad (defined below), Exhibit A. Upon information and belief, Defendant John Doe 3 is, directly and/or indirectly, engaged in, and/or is directing, controlling, ratifying, facilitating, promoting, or otherwise participating in, the advertisement, promotion, sale, distribution, and supply of services under the name TEESUPPORT, and/or benefits financially from the sale of services under the name TEESUPPORT, as set forth herein, but whose identity, actual name, address and telephone number is unconfirmed or presently unknown.

15. Upon information and belief, Defendant John Doe 4 is an individual or entity whose actual name is unconfirmed.

16. Upon information and belief, Defendant John Doe 4 has used the name Cindy Moore and has authored advertisements for services under TEESUPPORT at the website located at <http://blog.teesupport.com>. See, for example, the December 27, 2012 Ad (defined below), Exhibit B. Upon information and belief, Defendant John Doe 4 is, directly and/or indirectly, engaged in, and/or is directing, controlling, ratifying, facilitating, promoting, or otherwise participating in, the advertisement, promotion, sale, distribution, and supply of services under the name TEESUPPORT, and/or benefits financially from the sale of services under the name TEESUPPORT, as set forth herein, but whose identity, actual name, address and telephone number is unconfirmed or presently unknown.

17. Upon information and belief, Defendant John Doe 5 is an individual or entity whose actual name is unconfirmed.

18. Upon information and belief, Defendant John Doe 5 has used the name Jolin and has authored advertisements for services for TEESUPPORT at the website located at <http://blog.teesupport.com>. See, for example, the February 18, 2012 Ad (defined below), Exhibit C1. Upon information and belief, Defendant John Doe 5 is, directly and/or indirectly, engaged in, and/or is directing, controlling, ratifying, facilitating, promoting, or otherwise participating in, the advertisement, promotion, sale, distribution, and supply of services under the name TEESUPPORT, and/or benefits financially from the sale of services under the name TEESUPPORT, as set forth herein, but whose identity, actual name, address and telephone number is unconfirmed or presently unknown.

## FACTUAL BACKGROUND

### *Plaintiff and its Business, Trademarks, and Web Domains*

19. Plaintiff is a highly successful technology company with the largest search advertising network outside of Google and Yahoo. Plaintiff delivers data-driven performance to the Internet's leading marketers through a technology platform that adjusts bids by both keyword and traffic source. Plaintiff does business with thousands of online publishers and advertisers, delivering premium Pay-Per-Click traffic to advertisers.

20. Since at least as early as September 2002, Plaintiff has invested substantial time, effort and resources in connection with the marketing and promotion of its services provided under the ADMARKETPLACE trademark.

21. Since at least as early as May 2007, Plaintiff has invested time, effort and resources into maintaining the websites appearing at [www.ampnetwork.net](http://www.ampnetwork.net), a domain name used in connection with the provision of Plaintiff's services, through which Plaintiff validates the authenticity of traffic across its Pay-Per-Click network. Plaintiff prominently displays its AMPNETWORK trademark at the ampnetwork.net website and uses the AMPNETWORK trademark in connection with Internet advertising services. Having been in use in connection with Plaintiff's business for many years, AMPNETWORK is one of the main ways Plaintiff's customers identify Plaintiff and the web traffic that is coming via Plaintiff.

22. As a result of Plaintiff's continuous and systematic use of the ADMARKETPLACE mark and the AMPNETWORK mark in commerce and the commercial success of the services sold under the marks, Plaintiff has obtained and achieved substantial goodwill in and to the ADMARKETPLACE and AMPNETWORK trademarks (collectively herein referred to as the "Marks").

23. The Marks have come to represent the valuable goodwill and reputation of Plaintiff as a provider of high quality online advertising, marketing and online monetization services. Consumers and others in the industry have come to favorably know, recognize and identify such services under the Marks as originating from Plaintiff. As a result of Plaintiff's long and continuous use of the Marks, and advertising and promotional efforts connected therewith, the ADMARKETPLACE and AMPNETWORK marks have acquired distinctiveness as source identifiers.

24. Plaintiff has acquired a reputation for excellence and outstanding service to customers. Plaintiff owns all trademark rights to the Marks, including without limitation, all common law trademarks rights for use in connection with online advertising, marketing and online monetization services. The goodwill associated with the ADMARKETPLACE and AMPNETWORK names and the Marks is a very valuable business asset to Plaintiff.

25. In connection with its business, Plaintiff advertises and promotes its services at several websites owned by Plaintiff, including those appearing at [www.admarketplace.com](http://www.admarketplace.com). In addition, Plaintiff uses certain domain names and the website(s) appearing, for example, at [www.ampnetwork.net](http://www.ampnetwork.net), as a portal through which clients of Plaintiff, advertisers and publishers, feed advertisements. (The admarketplace.com and the ampnetwork.net domain names are collectively referred to herein as the "Domain Names"). The Domain Names and Internet traffic to and through the Domain Names are an integral component of Plaintiff's business, which revolves around Internet advertising. Customers, clients, the industry, and the public identify Plaintiff and its services through the Domain Names.

### ***Defendants and their Advertisements***

26. Upon information and belief, Defendants, individually and/or collectively, provide online technical support to individual consumers and small businesses under the name TEESUPPORT. Defendants' stated technical support services include, without limitation, virus removal, data recovery and system maintenance as set forth in the website screenshots and printouts attached hereto as Exhibit D.

27. Upon information and belief, Defendants provide their services to Internet users all over the United States, including individuals and businesses located in this judicial district in the State of New York.

28. Upon information and belief, Defendants published content on the Internet accessible at <http://blog.teesupport.com> and published content on the Internet accessible at <http://removevirustool.blogspot.com> (collectively, the "Advertisements"), copies of which are attached as Exhibits A, B, C1 and E. The Advertisements appear on the Internet and are accessible throughout the world.

29. The Advertisements purport to inform readers about existing computer issues such as viruses, spyware and malicious computer software ("malware") and recommend steps and tools to help resolve those computer issues. The Advertisements appear at websites that, at first blush, look like informational blogs. In actuality, however, the content at <http://blog.teesupport.com> and <http://removevirustool.blogspot.com> promotes Defendants' business(es) and services to fix computer problems, and through links appearing on the web page(s), directs Internet users to Defendants' website(s) and web pages for the purchase of Defendants' services. Accordingly, the content at <http://blog.teesupport.com> and



<http://removevirustool.blogspot.com> are advertisements used to advertise and promote the sale of Defendants' services for profit even if they were posted for "free" under the guise of blogs.

***Defendants' Statements About Plaintiff and Plaintiff's Services***

30. In the Advertisements, Defendants state that ADMARKETPLACE.COM and AMPNETWORK.NET are malicious viruses or malware which must be removed and that, by using Defendants' services which can be purchased through the Internet or by telephone, users can remove these purported viruses or malware.

31. In particular, in one Advertisement, which was placed on a weblog serviced by Google, dated August 21, 2012 (the "August 21, 2012 Ad"), a copy of which is attached hereto as Exhibit A,<sup>1</sup> Defendants allege that AMPNETWORK.NET is a "redirect virus" which causes "computer stability [to] be violated ... security settings [to] be changed and ... parasites [to] kick in," among other intrusive and harmful effects. Defendants suggest that those associated with AMPNETWORK.NET are using the "malware" for financial gain.

On first look, Ampnetwork.net is a plain site which promotes search syndication and encourage users to become network partners. Whereas, even careless users may have found that it's really a poorly-established sites with half-covered-up contact email. Such Google Redirect Virus is elaborated to obtain revenue from the artificially re-routed traffic. Generally it's bundled with freeware or shareware and slips into the system along with the parastifier program installation without explicit consent. In addition to frequent search redirect and sluggish response, some observant users may take notice of other changes such as the modified warning boxes and numerous suspicious sites are added to favorites. Only a small percentage of users know that it's also capable of tracking online activities and forwarding them to remote servers. Furthermore, if there is no timely action taken to completely remove Ampnetwork.net malware, the computer stability will be violated since security settings will be changed and more parasites will kick in.

32. The August 21, 2012 Ad instructs readers to "contact a 24/7 online expert" at TeeSupport to "get rid of Ampnetwork.net redirect virus."

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<sup>1</sup> The August 21, 2012 Ad is accessible at <http://removevirustool.blogspot.com/2012/08/how-to-manually-delete-remove.html>, <http://removevirustool.blogspot.com/search?q=ampnetwork>, [http://removevirustool.blogspot.com/2012\\_08\\_01\\_archive.html](http://removevirustool.blogspot.com/2012_08_01_archive.html) and <http://removevirustool.blogspot.com/2012>.

33. In another Advertisement dated December 27, 2012 (the “December 27, 2012 Ad”), a copy of which is attached hereto as Exhibit B,<sup>2</sup> Defendants allege that AMPNETWORK.NET is a “malicious computer redirect virus participating in a large-scale search engine hijack” which “is created with malicious code” and will “shut down ... anti-virus and anti-spyware programs,” and “infect and corrupt [a user’s] registry, leaving [the user’s] computer totally unsafe.” Defendants further allege that the virus designers aim to get money via the virus’ activities, among other things.

Ampnetwork.net (<http://ampnetwork.net/>) is a malicious computer redirect virus participating in a large-scale search engine hijack.... Firstly, this pest infiltrates target PCs breezily without any alarm and easily bypasses Windows firewall & security software in some cases. This sort of phenomenon is triggered by a rootkit which is a really intricate cyber threat. Secondly, every time when you visit your favorite domains, the <http://ampnetwork.net/> and more related URLs pop up because it may replace your default homepage or reroute you from SERPs (search engine results pages) replacing the actual link you intent to navigate-that’s where the greatest problem is. Even though you make efforts to get back the homepage or reinstall your browser, only to find all the attempts turn to be in vain. You always get the traffic redirected to unwanted pages from legitimate search engines. Under such circumstance, all your search results will be controlled by Ampnetwork.net rather than your original search provider. Please beware that the designers of the redirect infection don’t just expect to disturb your browser habits, they own more dangerous goals, and to be clear, money is their ultimate purpose. In a word, it’s of high importance to uninstall Ampnetwork.net nuisance as well as its associated malware campaign quickly and completely to protect the security of infected machines and users’ properties.

34. The December 27, 2012 Ad further states the following to be “[s]everal [h]armful [p]roperties [e]mbodied in Ampnetwork.net”:

This redirect virus will constantly redirect your internet connection and tell you that you are browsing unsafely. Your computer is acting slowly. This web browser slows down your system significantly. This includes starting up, shutting down, playing games, and surfing the web. Searches are redirected or your homepage and desktop are settings are changed. This is an obvious symptom of this infection. The cyber threat will shut down your other anti-virus and anti-

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<sup>2</sup> The December 27, 2012 Ad is accessible at <http://blog.teesupport.com/infected-with-ampnetwork-net-redirect-virus-how-to-remove-amp-network-net/>. Additionally, users can access the December 27, 2012 Ad by visiting <http://blog.teesupport.com/page/37/> or <http://blog.teesupport.com/?s=ampnetwork>.

spyware programs. It will also infect and corrupt your registry, leaving your computer totally unsafe. You are getting pestered with lots of pop ups. The hijacker virus infects your registry and uses it to launch annoying pop up ads out of nowhere.

35. The December 27, 2012 Ad scares readers into purchasing Defendants' services by stating "manually remov[ing] Ampnetwork.net by yourself ... can permanently damage your system" and "manual spyware removal is recommended for skilled users only." Users should "get help from an Online Computer Expert" at TeeSupport to get rid of Ampnetwork.net.

36. Also, in an Advertisement dated July 16, 2012 (the "July 16, 2012 Ad"), a copy of which is attached hereto as Exhibit E,<sup>3</sup> Defendants posted content regarding mysearchresults.com, a site unrelated to Plaintiff, claiming that "mysearchresults.com is malicious virus that could be installed to a weak system as undesirable toolbar...." In the July 16, 2012 Ad, Defendants also state that "admarketplace.com must be terminated as soon as possible no matter it's [sic] your home computer or work computer." [Emphasis added.]

37. In addition, Defendants misuse Plaintiff's ADMARKETPLACE trademark within meta tags embedded within computer code at Defendants' website blog.teesupport.com. A search for "admarketplace" on blog.teesupport.com brings up an Advertisement dated February 18, 2012 entitled "How to Remove Google Redirect Virus Manually, Help to Eliminate Google Redirect Virus From Windows Xp/Vista/7" (the "February 18, 2012 Ad"), a copy of which is attached hereto as Exhibit C1.<sup>4</sup> See also Exhibit C2, excerpt of the related source code page. Although there are no visible references to "admarketplace" on the post or webpage itself, a reader is led to believe that adMarketplace is associated with a virus simply based on the fact that a search for "admarketplace" brings up the post—a post that discusses how to remove a virus.

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<sup>3</sup> The July 16, 2012 Ad can be found on <http://removevirustool.blogspot.com/search?q=admarketplace> or <http://removevirustool.blogspot.com/2012/07/remove-nasty-mysearchresultscom.html>.

<sup>4</sup> The February 18, 2012 Ad can be found on <http://blog.teesupport.com/?s=admarketplace>.

### ***The Truth***

38. Plaintiff is a legitimate business that provides valuable services. Defendants' characterizations and statements about Plaintiff, the Domain Names, and Plaintiff's services are unfounded and false.

39. Plaintiff does not make, use, distribute or promote viruses or malware. Nor does Plaintiff in any way participate in downloadable software distribution through ADMARKETPLACE.COM, AMPNETWORK.NET or otherwise. ADMARKETPLACE.COM and AMPNETWORK.NET are legitimate and reputable websites. Plaintiff is not a virus or malware. Plaintiff's services are not viruses or malware and do not distribute viruses or malware.

40. Defendants' statements relating to Plaintiff, ADMARKETPLACE.COM, AMPNETWORK.NET, and the Marks are false and misleading. The Advertisements and Defendants' activities state and give Internet users, including Plaintiff's customers and prospective customers, the false impression that Plaintiff, its business, its services, and/or the Domain Names are viruses or malware, or are linked with viruses or malware, used or created to disrupt computer operations, gain access to private computer systems, and gather sensitive information for dishonest financial gain.

41. As a result of Defendants' conduct, Internet users, including Plaintiff's customers and prospective customers, have already associated and/or will associate the services provided by Plaintiff and the websites maintained and used by Plaintiff with these undesirable and harmful items, e.g., viruses and malware, and/or Internet users seeking Plaintiff and its services may discontinue their search for, and their interest in engaging, Plaintiff.

42. The Advertisements also give Internet users, including Plaintiff's customers and prospective customers, the false impression that Defendants' services are appropriate for, and capable of, removing malware that does not actually exist.

***Plaintiff's Prior Notice to Defendants***

43. In June of 2012, Plaintiff sent written notice to Defendant Tee Support, Inc. and Defendant John Doe 1 notifying them that their advertisements for virus and spyware removal services publish false and misleading representations and statements about adMarketplace. A copy of Plaintiff's June 29, 2012 letter (the "June 29, 2012 Letter") is attached hereto as Exhibit F.

44. Specifically, the June 29, 2012 Letter noted that the Defendants' promotion of the use and sale of Defendants' services to get rid of "Admarketplace.com," a purported "fraudulent web hijacker malware which promotes notorious fake antispysware application," "block[s] security software," and "flood[s] [users] with numerous commercial advertisements," among other intrusive and harmful effects, was baseless, false and misleading. Defendants' advertisements also recommended its "expert skills" and services in order to remove Admarketplace.com—another false and misleading statement.

45. Plaintiff demanded, among other things, that Defendant Tee Support, Inc. and Defendant John Doe 1 immediately remove all web-based content and advertising relating to "adMarketplace" and "admarketplace.com."

46. At the same time, Plaintiff sent a letter to SoftLayer Technologies, Inc. ("SoftLayer"), the Internet Service Provider that hosted Defendants' website, [www.teesupport.com](http://www.teesupport.com), requesting, among other things, SoftLayer's cooperation to remove Defendants' web-based content and advertising relating to "adMarketplace" and

“admarketplace.com” from all websites managed or controlled by SoftLayer. See Exhibit G, a copy of the June 29, 2012 letter to SoftLayer (the “June 29, 2012 SoftLayer Letter”). Although Plaintiff never received a response from Defendant Tee Support, Inc. or Defendant John Doe 1, on or about July 23, 2012, the web-based content and advertising of which Plaintiff complained in the June 29, 2012 Letter and the June 29, 2012 SoftLayer Letter were removed.

47. On or about November 16, 2012, upon learning of the new content as set forth above, Plaintiff sent Defendants another letter notifying Defendants, again, that they were causing irreparable damage to Plaintiff and its reputation through Defendants’ baseless, false, and misleading claims about Plaintiff and its services. Plaintiff requested that Defendants rectify the problem immediately by “(1) tak[ing] down and remov[ing] all websites and web pages that contain advertisements and/or references to AMPNETWORK.NET in connection with Defendants’ services and/or offerings; (2) ceas[ing] all promotion of its services and/or offerings for use in connection with the removal of “AMPNETWORK.NET”; and (3) remov[ing] all existing content, and ceas[ing] from publishing commentary and advertisements, concerning AMPNETWORK.NET.” See Exhibit H, a copy of the November 16, 2012 letter to Defendants.

48. Despite Plaintiff’s November 16, 2012 letter, Defendants have failed to respond to Plaintiff or to take any corrective action.

49. Upon information and belief, Defendants are willfully creating derogatory and harmful content to the detriment of Plaintiff and to the benefit of Defendants for financial gain.

50. Upon information and belief, Defendants make false and misleading statements about Plaintiff and its services in order to cause consumers to purchase Defendants’ products and services.

51. Defendants' conduct and activities will cause Plaintiff to lose customers and has already caused Plaintiff to lose potential customers who chose not to engage Plaintiff because of Defendants' statements and conduct.

52. Indeed, on or about June 25, 2012, Plaintiff was contacted by a potential customer who was initially interested in engaging Plaintiff's services but chose not to because of the content concerning Plaintiff published by Defendants.

53. Defendants' activities have thereby caused and/or will cause Plaintiff to lose customers and business and have negatively impacted the reputation of Plaintiff.

54. Defendants' actions are deliberate and willful with full knowledge that their statements are false or were committed in reckless disregard of the truth or falsity of their statements.

#### **FIRST CLAIM FOR RELIEF**

##### **False Representation, Unfair Competition And False Advertising (Federal)**

55. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 54, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

56. As set forth above, Defendants, in connection with their promotion and offering of their services, make false claims about Plaintiff and its services. Defendants also make false claims that their services remove a specified malware even though Defendants know or have reason to know that their services do not remove such malware because such malware does not exist.

57. Defendants' unlawful and improper actions as set forth above have deceived and/or are likely to deceive customers into believing that Plaintiff's services are harmful and damaging, that they should avoid Plaintiff, and that they should not use Plaintiff's services.

58. Plaintiff's customers and potential customers who view the Advertisements published by Defendants have been, and are likely to be deceived, into thinking that Plaintiff's services are, or are related to, viruses or malware.

59. Defendants' acts constitute the use in commerce of false descriptions or representations.

60. Defendants, by falsely representing that Plaintiff, its services, and the ADMARKETPLACE and AMPNETWORK trademarks are malware or a virus with intrusive and harmful effects, are misrepresenting the nature, characteristics and qualities of Plaintiff's services.

61. Defendants' false statements have materially affected or are likely to have a material effect on the purchasing decisions of Plaintiff's customers and prospective customers.

62. Defendants' acts of false description and false representation, unfair competition and false advertising have caused Plaintiff to sustain monetary damage, loss, and injury, in an amount to be determined at trial.

63. Defendants have engaged in these activities knowingly and willfully, so as to justify the assessment of treble damages under 15 U.S.C. § 1117.

64. Defendants' acts of false description and false representation, unfair competition and false advertising, unless enjoined by this Court, will continue to cause Plaintiff to sustain irreparable damage, loss and injury, for which Plaintiff has no adequate remedy at law.

**SECOND CLAIM FOR RELIEF**  
Unfair Competition, False Advertising and  
Misappropriation (Common Law)

65. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 64, inclusive, of this Complaint with the same force and effect as if fully set forth herein.



66. In the Advertisements, Defendants use false and misleading representations concerning Plaintiff, Plaintiff's services, and Plaintiff's business in order to promote Defendants' services.

67. Plaintiff has expended considerable labor, skill and money to build its reputation and goodwill as a provider of high quality online advertising, marketing and online monetization services.

68. Defendants misappropriate Plaintiff's reputation and renown in the online advertising industry in order to promote Defendants' own business for commercial advantage, while tarnishing Plaintiff's reputation and goodwill in the process.

69. Defendants' unlawful activities, as set forth above, misappropriate and trade upon the reputation and goodwill of Plaintiff in the Marks, thereby injuring that reputation and goodwill.

70. Defendants' unlawful activities constitute unfair competition, false advertising and misappropriation as proscribed by the common law.

71. Defendants' acts of unfair competition, false advertising and misappropriation have caused Plaintiff to sustain monetary damage, loss and injury, in amounts to be determined at trial.

72. Defendants' acts of unfair competition, false advertising and misappropriation, unless enjoined by this Court, will continue to cause Plaintiff to sustain irreparable damage, loss and injury, for which Plaintiff has no adequate remedy at law.

### **THIRD CLAIM FOR RELIEF**

#### **Deceptive Acts and Practices NY GEN. BUS. LAW § 349**

73. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 72, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

74. Through the Advertisements, in which Defendants promote and offer to sell its services by means of false claims about Defendants' own services and Plaintiff and its services, as set forth above, Defendants have engaged in and are engaging in consumer-oriented conduct that has materially affected the public interest of the State of New York and has resulted in injury to consumers in the State of New York.

75. Defendants' acts constitute deceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service and present a continuing threat to the consuming public in that the public is likely to be deceived and misled in a material respect as to the nature, characteristics and qualities of Defendants' services, as well as the nature, characteristics and qualities of Plaintiff's services.

76. Customers are likely to be misled into buying Defendants' services.

77. By virtue of the aforementioned acts and conduct, Defendants have engaged, and continue to engage, in deceptive acts and practices in violation of the New York General Business Law § 349 to the detriment of Plaintiff.

78. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has been injured and will continue to suffer injury to Plaintiff's reputation, business, and goodwill, and the lessening of goodwill associated with Plaintiff's trademark and its services sold in connection with the Marks.

79. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has suffered and will continue to suffer injury in fact resulting in the loss of money, goodwill and/or property in an amount to be determined at trial.

80. In addition, Defendants have caused and, unless enjoined and restrained, will continue to cause irreparable harm to Plaintiff, for which Plaintiff has no adequate remedy at law.

#### **FOURTH CLAIM FOR RELIEF**

##### **False Advertising NY GEN. BUS. LAW § 350**

81. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 80, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

82. Through the Advertisements, in which Defendants promote and offer to sell its services by means of false claims about Defendants' own services and Plaintiff and its services, as set forth above, Defendants have engaged in and are engaging in consumer-oriented conduct that has materially affected the public interest of the State of New York and has resulted in injury to consumers in the State of New York.

83. Defendants' acts constitute false advertising in the conduct of any business, trade or commerce or in the furnishing of any service and present a continuing threat to the consuming public in that the public is likely to be deceived and misled in a material respect as to the nature, characteristics and qualities of Defendants' services, as well as the nature, characteristics and qualities of Plaintiff's services.

84. By virtue of the aforementioned acts and conduct, Defendants have engaged, and continue to engage, in false advertising in violation of the New York General Business Law § 350 to the detriment of Plaintiff.

85. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has been injured and will continue to suffer injury to Plaintiff's reputation, business, and goodwill, and the lessening of goodwill associated with Plaintiff's trademark and its services sold in connection with the Marks.

86. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has suffered and will continue to suffer injury in fact resulting in the loss of money, goodwill and/or property in an amount to be determined at trial.

87. In addition, Defendants have caused and, unless enjoined and restrained, will continue to cause irreparable harm to Plaintiff, for which Plaintiff has no adequate remedy at law.

**FIFTH CLAIM FOR RELIEF**  
Injury to Business Reputation and Trademark Dilution  
NY GEN. BUS. LAW § 360-L

88. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 87, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

89. Through prominent, long and continuous use in commerce, including commerce within New York, Plaintiff's mark ADMARKETPLACE has become and continues to be distinctive.

90. Defendants' use of the Marks, including placement of the ADMARKETPLACE trademark within meta tags embedded into Defendants' website, in connection with the sale and advertisement of Defendants' services is a commercial use of Plaintiff's trademark.

91. Defendants' use began after Plaintiff's mark became distinctive.

92. Defendants' use of Plaintiff's ADMARKETPLACE trademark has diluted, and is likely to cause dilution of, the distinctive quality and the value of the mark through tarnishment.

93. Due to Defendants' use of Plaintiff's ADMARKETPLACE trademark, Plaintiff's mark will lose its ability to serve as a unique identifier of Plaintiff's services.

94. Defendants have also tarnished and continue to tarnish Plaintiff's mark by improperly associating the mark with harmful and offensive materials.

95. By virtue of the aforementioned acts and conduct, Defendants have knowingly and willfully caused, and continue to cause, injury to Plaintiff's business reputation and dilution of the distinctive quality of Plaintiff's trademark, in violation of the New York General Business Law § 360-L to the detriment of Plaintiff.

96. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has been injured and will continue to suffer injury to Plaintiff's reputation, business, and goodwill, and the lessening of goodwill associated with Plaintiff's trademark and its services sold in connection with the ADMARKETPLACE trademark.

97. Defendants have caused and, unless enjoined and restrained, will continue to cause irreparable harm to Plaintiff, for which Plaintiff has no adequate remedy at law.

#### **SIXTH CLAIM FOR RELIEF**

##### **Tortious Interference with Prospective Contractual Relations and Business Relations**

98. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 97, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

99. Through the Advertisements, in which Defendants promote and offer to sell its services by means of false claims about Defendants' own services and Plaintiff and its services, as set forth above, Defendants intentionally interfered with Plaintiff's prospective contractual relations and business relations.

100. Plaintiff had a reasonable expectancy of continuing contractual relationships with current customers and of entering into contracts with prospective customers.

101. Plaintiff had made Defendants aware of the injury they were causing Plaintiff; yet Defendants have not ceased their actions and conduct.

102. But for the Advertisements and Defendants' intentional and wrongful conduct, Plaintiff's customers would have continued to engage, and prospective customers would have engaged, Plaintiff's services.

103. By virtue of the previously described acts, Defendants have caused damage and irreparable injury to Plaintiff in an amount to be determined at trial.

**SEVENTH CLAIM FOR RELIEF**  
Defamation—Libel *Per Se*—Injury to Business Trade

104. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 103, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

105. Defendants made false statements of fact regarding Plaintiff and its services, including the Domain Names.

106. Defendants published these false statements to third parties through the advertisements posted on Defendants' websites.

107. Upon information and belief, the advertisements on Defendants' websites were created for commercial and economic gain and are designed to entice consumers to purchase Defendants' products and services.

108. Upon information and belief, Defendants published or caused to be published this false information about Plaintiff and its services with knowledge of its falsity or with a reckless disregard of its truth or falsity.

109. Upon information and belief, Defendants published this information with the intent to harm Plaintiff's interests or with knowledge that harm to Plaintiff's interests would inevitably result.

110. Defendants' statements are libelous *per se* because they injure Plaintiff in its business trade.

111. By virtue of the previously described acts, Defendants have caused damage and irreparable injury to Plaintiff in an amount to be determined at trial.

112. Defendants' acts will result in further damage and irreparable injury if Defendants are not restrained from violating Plaintiff's rights, for which Plaintiff has no adequate remedy at law.

#### **EIGHTH CLAIM FOR RELIEF**

##### **Defamation—Libel *Per Se*—Accusation of Criminal Conduct**

113. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 112, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

114. Defendants made false statements of fact regarding Plaintiff and its services, including the Domain Names.

115. Defendants published these false statements to third parties through the advertisements posted on Defendants' websites.

116. Upon information and belief, the advertisements on Defendants' websites were created for commercial and economic gain and are designed to entice consumers to purchase Defendants' products and services.

117. Upon information and belief, Defendants published or caused to be published this false information about Plaintiff and its services with knowledge of its falsity or with a reckless disregard of its truth or falsity.

118. Upon information and belief, Defendants published this information with the intent to harm Plaintiff's interests or with knowledge that harm to Plaintiff's interests would inevitably result.

119. Defendants' statements are libelous *per se* because they accuse Plaintiff of committing a serious crime.

120. By virtue of the previously described acts, Defendants have caused damage and irreparable injury to Plaintiff in an amount to be determined at trial.

121. Defendants' acts will result in further damage and irreparable injury if Defendants are not restrained from violating Plaintiff's rights, for which Plaintiff has no adequate remedy at law.

**NINTH CLAIM FOR RELIEF**  
**Trade Libel and Product Disparagement**

122. Plaintiff repeats, reiterates and realleges each and every allegation in paragraphs 1 through 121, inclusive, of this Complaint with the same force and effect as if fully set forth herein.

123. Defendants made false statements of fact regarding Plaintiff's business, commercial activities, and services, including the Domain Names.

124. Defendants published these false statements to third parties through the advertisements posted on Defendants' websites.



125. Upon information and belief, the advertisements on Defendants' websites were created for commercial and economic gain and are designed to entice consumers to purchase Defendants' products and services.

126. Upon information and belief, Defendants published or caused to be published this false information about Plaintiff's business, commercial activities, and services, including the Domain Names, with knowledge of its falsity or with a reckless disregard of its truth or falsity.

127. Upon information and belief, Defendants published this information with the intent to harm Plaintiff's interests or with knowledge that harm to Plaintiff's interests would inevitably result.

128. By virtue of Defendants' false and misleading statements as set forth herein, and by alleging that Plaintiff's services are, or are related to, harmful malware, Defendants have intentionally disparaged the quality of Plaintiff's services and interfered with Plaintiff's business.

129. Defendants' publication of the false and misleading statements was a substantial factor in inducing prospective customers not to have business dealings with Plaintiff.

130. As a direct and proximate result of Defendants' false and misleading statements about Plaintiff's business, commercial activities, and services, and as a direct and proximate result of Defendants' trade libel against Plaintiff's product and services, Plaintiff has suffered monetary damages in an amount to be proven at trial.

131. As a further direct and proximate result of Defendants' publication of false and disparaging information about Plaintiff's services, Plaintiff has suffered special damages, at least including loss of profits and loss incurred in having to expend time and money to correct the misrepresentations made by Defendants.

132. Defendants' acts will result in further damage and irreparable injury if Defendants are not restrained from violating Plaintiff's rights, for which Plaintiff has no adequate remedy at law.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests this Court grant judgment against Defendants on all causes of action as follows:

A. For a preliminary and permanent injunction against Defendants, restraining and enjoining Defendants from:

- i. displaying content that connect or associate, in any way, Plaintiff and/or its services with a virus, malware, removal or removal tools, or otherwise suggesting that Plaintiff or its services are harmful to Internet users;
- ii. using the ADMARKETPLACE or AMPNETWORK trademarks (however spelled, whether capitalized, abbreviated, singular or plural, printed or stylized, whether used alone or in combination with any word or words, whether used as an Internet domain name or in meta tags or other Internet uses, and whether used in caption, text, orally or otherwise), or any other reproduction, counterfeit, copy, colorable imitation or confusingly similar variation of the marks, to suggest in any way that Plaintiff and/or its services are a virus or malware, or require removal or removal tools, or otherwise suggesting that Plaintiff or its services are harmful to Internet users;
- iii. using in connection with any goods or services any false or deceptive designation, description or representation, whether by words or symbols, which suggests or implies in any way that Plaintiff and/or its services are a

virus or malware, or require removal or removal tools, or which otherwise suggests that Plaintiff or its services are harmful, or which gives Defendants an unfair competitive advantage in the marketplace, or which constitutes false advertising;

- iv. engaging in any acts of common law unfair competition, false advertising or misappropriation which would damage or injure Plaintiff;
- v. engaging in any deceptive acts and practices, false advertising, unfair competition which would damage or injure Plaintiff;
- vi. engaging in any acts which injure Plaintiff's business reputation or denigrate the quality of Plaintiff's services;
- vii. effecting assignments or transfers, forming new entities or associations, or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in any final judgment or order in this action; and
- viii. inducing, encouraging, instigating, aiding, abetting or contributing to any of the aforesaid acts.

B. For an award of Defendants' profits or other advantages and Plaintiff's damages resulting from Defendants' unlawful acts set forth herein, in an amount to be proven at the time of trial, together with legal interest from the date of accrual thereof.

C. For an award requiring Defendant, at its own expense, to furnish and distribute corrective marketing literature in a form to be approved by Plaintiff to acknowledge Defendants' violations of the law hereunder, and to ameliorate the false and deceptive impressions produced by such violations.

D. For an award of treble damages, in an amount to be proven at the time of trial, pursuant to 15 U.S.C. § 1117.

E. For an award of exemplary and punitive damages and/or increased profits, in an amount to be proven at the time of trial.

F. For an award of attorneys' fees and disbursements incurred by Plaintiff in this action.

G. For an award of costs for this action.

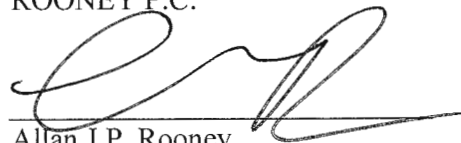
H. For an award of other and further relief as the Court may deem equitable and proper.

Respectfully submitted,

ROONEY P.C.

Dated: August 1, 2013

By:



Allan J.P. Rooney

Scott D. Laton

Brad M. Behar, Of Counsel

800 Third Avenue

New York, NY 10022

Tel: (212) 545-8022

Fax: (646) 417-7000

Attorneys for Plaintiff

adMarketplace Inc.

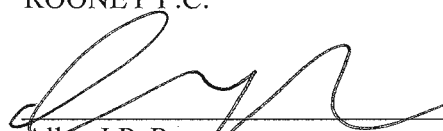
### DEMAND FOR JURY TRIAL

Plaintiff requests a trial by jury pursuant to Fed. R. Civ. P. 38 and the 7<sup>th</sup> Amendment of the United States Constitution.

Dated: August 9, 2013

ROONEY P.C.

By:



Allan J.P. Rooney

Scott D. Laton

Brad M. Behar, Of Counsel

800 Third Avenue

New York, NY 10022

Tel: (212) 545-8022

Fax: (646) 417-7000

Attorneys for Plaintiff

adMarketplace Inc.

# **EXHIBIT A**

# removevirstool

Tuesday, August 21, 2012

## How to Manually Delete / Remove Ampnetwork.net Redirect Virus

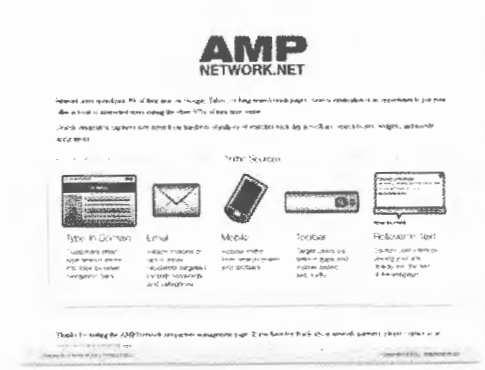
Got hit with annoying Ampnetwork.net redirects somehow? All scans shows perfectly clean whereas the lingering browser diversion is just still there? Wondering if there is any effective tool to get rid of Ampnetwork.net redirect virus? This post supported by Tee Support 24/7 online tech team will help you find the way out.

### Ampnetwork.net Description

On first look, Ampnetwork.net is a plain site which promotes search syndication and encourage users to become network partners. Whereas, even careless users may have found that it's really a poorly-established sites with half-covered-up contact email. Such Google Redirect Virus is elaborated to obtain revenue from the artificially re-routed traffic. Generally it's bundled with freeware or shareware and slips into the system along with the parastifier program installation without explicit consent.

In addition to frequent search redirect and sluggish response, some observant users may take notice of other changes such as the modified warning boxes and numerous suspicious sites are added to favorites. Only a small percentage of users know that it's also capable of tracking online activities and forwarding them to remote servers. Furthermore, if there is no timely action taken to completely remove Ampnetwork.net malware, the computer stability will be violated since security settings will be changed and more parasites will kick in.

### Ampnetwork.net Screenshot



### Any Suggested Tool to Eliminate Ampnetwork.net?

Most antivirus fails to pick up the redirect virus since such malware is orchestrated to bypass detection exploiting network vulnerabilities. You may have deleted all tracking cookies, and tried to find the malicious program from add / remove program on Control Panel, but the disgusting redirection is still there after system restart even when you re-open the browser. Manual means is confirmed to be the best approach to delete Ampnetwork.net. Below steps can be used as reference:

Step 1 : Go to Task Manager with Alt+Ctrl+Delete and stop its process.

random.exe

Step 2: Search for and delete its related files in Local Disk C:

%AllUsersProfile%\Application Data~

%AllUsersProfile%\Application Data.exe

### Blog Archive

2013 (20)

2012 (146)

December (29)

November (28)

October (13)

September (8)

August (6)

How to Delete / Remove  
seekportals.com Redirect Vi...

How to Manually Delete / Remove  
Ampnetwork.net Red...

How to Remove / Delete  
Spyware.Zbot.cont Virus

Infected with Win32/Conedex.D - How to  
Manually Re...

How to Remove Fake Windows  
Interactive Safety - Ma...

How to Remove MyBrowserBar.com  
Browser Hijacker Vi...

July (23)

June (38)

May (1)

### About Me

Sarah

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C:\WINDOWS\System32\EasyRedirect.dll  
C:\Users\Username\AppData\Local\Temp\random.exe  
C:\Windows\SysWOW64\rundll32.exe  
C:\Program Files (x86)\Lavasoft\Ad-Aware\AAWTray.exe

Step 3: Navigate to remove the registry entries associated as below in Registry Editor:

HKEY\_CURRENT\_USER\Software\Microsoft\Windows\CurrentVersion\Run\Random Characters  
HKEY\_CURRENT\_USER\Software\Microsoft\Internet Explorer\Random Characters  
HKEY\_LOCAL\_MACHINE\SOFTWARE\Wow6432Node\Microsoft\Windows\CurrentVersion\Run\  
random thing  
HKEY\_LOCAL\_MACHINE\Software\Microsoft\Windows\CurrentVersion\Internet Settings: "Proxy  
Enable" = 1  
HKEY\_LOCAL\_MACHINE\Software\Microsoft\Windows\CurrentVersion\Internet Settings: "Proxy  
Override" =

*Notes: If you are still confused with above procedures, please click here to contact a  
24/7 online expert for more details.*

---

→ Posted by Sarah at 2:04 PM

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**Labels:** completely remove Ampnetwork.net malware, delete Ampnetwork.net., et rid of  
Ampnetwork.net redirect virus

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# removevirstool

Tuesday, August 21, 2012

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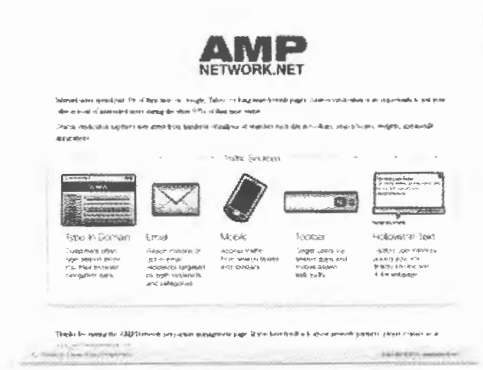
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[How to Remove Fake Windows Interactive Safety - Ma...](#)

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July (23)

June (38)

May (1)

## About Me



Sarah Mock

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HKEY\_CURRENT\_USER\Software\Microsoft\Internet Explorer\Random Characters  
HKEY\_LOCAL\_MACHINE\SOFTWARE\Wow6432Node\Microsoft\Windows\CurrentVersion\Run\random thing  
HKEY\_LOCAL\_MACHINE\Software\Microsoft\Windows\CurrentVersion\Internet Settings: "Proxy Enable" = 1  
HKEY\_LOCAL\_MACHINE\Software\Microsoft\Windows\CurrentVersion\Internet Settings: "Proxy Override" =

*Notes: If you are still confused with above procedures, please click here to contact a 24/7 online expert for more details.*

→ Posted by Sarah Mock at 2:04 PM

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**Labels:** completely remove Ampnetwork.net malware, delete Ampnetwork.net., et rid of Ampnetwork.net redirect virus

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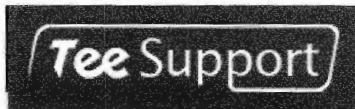
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### Infected With Ampnetwork.net Redirect Virus? How to Remove Amp network.net

Published December 27th, 2012 by Cindy Moore

Is your browser constantly redirected to Ampnetwork.net and you can't stop the annoying pop-ups after attempting everything? Are you frustrated by getting rid of this infection although all kinds of protection tools are used but still in the dark? This post will do you a favor, or you can ask [Tee Support agents 24/7 online](#) for instant help.

#### Ampnetwork.net Information

**Malware Type:** Browser hijacker virus

**Threat Risk Coefficient:** ★★★★★ High-level

**Advice:** Remove it ASAP

Ampnetwork.net (<http://ampnetwork.net/>) is a malicious computer redirect virus participating in a large-scale search engine hijack. It affects most of famous Internet Browsers such as Internet Explorer, Mozilla Firefox, Google Chrome and others. From the primary impression, you may think the virus has nothing different from the legit web pages because it has a decent interface and also contains ample contents. However, the fact is far from what it appears to be. There are severe issues with this search page. Firstly, this pest infiltrates target PCs breezily without any alarm and easily bypasses Windows firewall & security software in some cases. This sort of phenomenon is triggered by a rootkit which is a really intricate cyber threat. Secondly, every time when you visit your favorite domains, the <http://ampnetwork.net/> and more related URLs pop up because it may replace your default homepage or reroute you from SERPs (search engine results pages) replacing the actual link you intent to navigate-that's where the greatest problem is. Even though you make efforts to get back the homepage or reinstall your browser, only to find all the attempts turn to be in vain. You always get the traffic redirected to unwanted pages from legitimate search engines. Under such circumstance, all your search results will be controlled by Ampnetwork.net rather than your original search provider. Please beware that the designers of the redirect infection don't just expect to disturb your browser habits, they own more dangerous goals, and to be clear, money is their ultimate purpose. In a word, it's of high importance to uninstall Ampnetwork.net nuisance as well as its associated malware campaign quickly and completely to protect the security of infected machines and users' properties.

#### Screenshot of Ampnetwork.net:

#### Latest Posts

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[Uninstall SmartBar Toolbar – How to Remove Search.creativetoolbars.com Redirect](#)

[How to Disable Tono PaySafeCard Virus: Remove Tono "Computer Locked" Scam](#)

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[How to Get rid of JS/Redirector.JL Virus Completely and Safely by Using Manual Method](#)

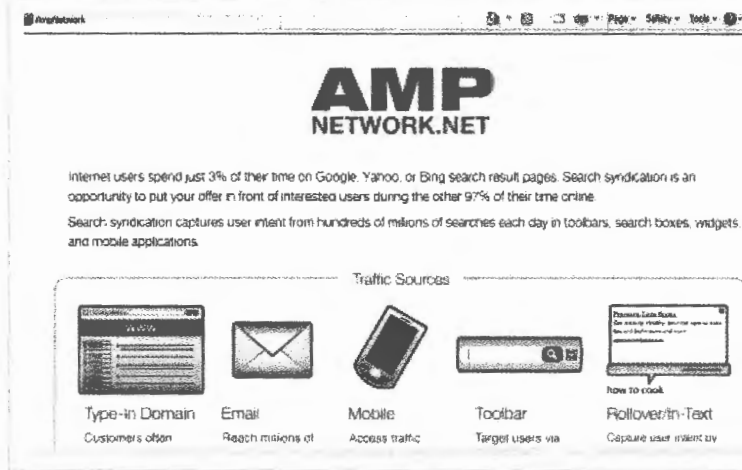
[Remove PUP.offerware Malware Completely, PUP.offerware Keeps Popping Up?](#)

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[Instant Savings App Removal Instructions-How to Remove Instant Savings App Adware from Computer](#)

[How to Completely Get Rid of Backdoor.Agent.RS?](#)



### Several Harmful Properties Embodied in Ampnetwork.net

This redirect virus will constantly redirect your internet connection and tell you that you are browsing unsafely.

Your computer is acting slowly. This web browser slows down your system significantly. This includes starting up, shutting down, playing games, and surfing the web.

Searches are redirected or your homepage and desktop are settings are changed. This is an obvious symptom of this infection.

The cyber threat will shut down your other anti-virus and anti-spyware programs. It will also infect and corrupt your registry, leaving your computer totally unsafe.

You are getting pestered with lots of pop ups. The hijacker virus infects your registry and uses it to launch annoying pop up ads out of nowhere.

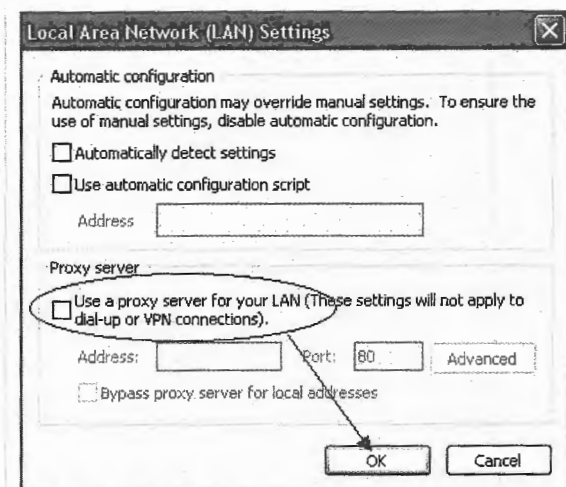
### Cannot Delete Ampnetwork.net by Antivirus Programs?

The Ampnetwork.net virus, as many other viruses, is created with malicious code and is changed daily or more often. That's why any of the antivirus programs can't keep up to remove the virus. When victim users tried with various security tools, they did not eliminate the virus, but messed up the computer more. Any unsure method is not recommended to remove the virus, but manual removal has always been the most effective way to get rid of it.

### Ampnetwork.net Step-by-Step Manual Removal Instructions

Step 1- Reset Internet Explorer by the following guide (take IE as an example):

Open Internet Explorer >> Click on Tools >> Click on Internet Options >> In the Internet Options window click on the Connections tab >> Then click on the LAN settings button >> Uncheck the check box labeled "Use a proxy server for your LAN" under the Proxy Server section and press OK.



[Assistance on Removing Trojan Horse Agent4.ACDI \(Virus Removal Instruction\)](#)

[How to Remove Gesellschaft Zur Verfügung Von Urheberrechtsverletzungen Virus](#)

[How to Disable Sftw red.com Redirect: Removal Guide](#)

[Failed to Uninstall Trojan.Spy.Bancos.AIR Threat? Help Remove Trojan.Spy.Bancos.AIR Virus Manually and Completely](#)

[How to Remove Stubborn Virus JS/Medfos.A?](#)

[Guide to Remove Win32.ZAccess-PB \[Trj\] Virus Manually - How to Get Rid of Win32.ZAccess-PB \[Trj\]](#)

[Safely Remove Trojan horse Rootkit-Pakes.BI with Detailed Steps](#)

[Remove Rootkit.MBR.Vrabber.A Step by Step \(Useful Tips for Rootkit.MBR.Vrabber.A Removal\)](#)

[How to Eliminate http://soundfrost.org/ Redirect: Removal Help](#)

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Step 2- Disable any suspicious startup items that are made by infections from Ampnetwork.net

For Windows Xp: Click Start menu -> click Run -> type: msconfig in the Run box-> click Ok to open the System Configuration Utility-> Disable all possible startup items generated from Ampnetwork.net.

For Windows Vista or Windows 7: click start menu->type msconfig in the search bar -> open System Configuration Utility-> Disable all possible startup items generated from Ampnetwork.net.

Step 3- Remove add-ons:

#### Internet Explorer

- 1) Go to 'Tools' -> 'Manage Add-ons';
- 2) Choose 'Search Providers' -> choose 'Bing' search engine or 'Google' search engine and make it default;
- 3) Select 'Search Results' and click 'Remove' to remove it;
- 4) Go to 'Tools' -> 'Internet Options', select 'General tab' and click 'Use default' button or enter your own website, e.g. Google.com. Click OK to save the changes.

#### Google Chrome

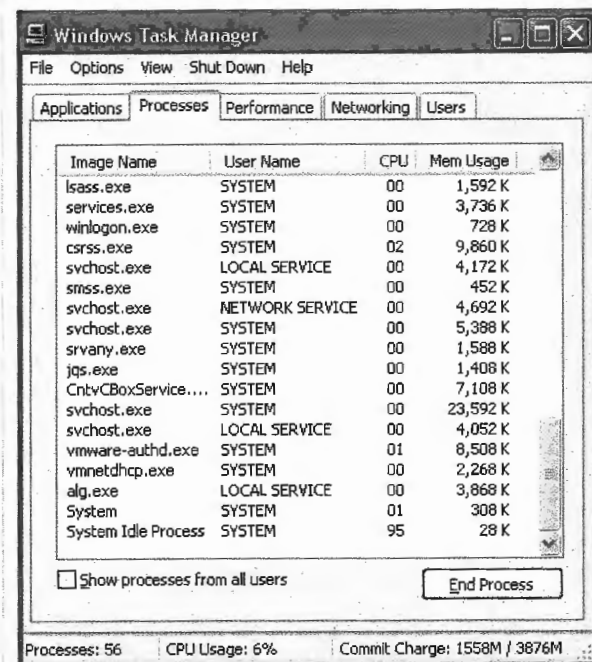
- 1) Click on 'Customize and control' Google Chrome icon, select 'Settings';
- 2) Choose 'Basic Options'.
- 3) Change Google Chrome's homepage to google.com or any other and click the 'Manage search engines...' button;
- 4) Select 'Google' from the list and make it your default search engine;
- 5) Select 'Search Results' from the list remove it by clicking the "X" mark.

#### Mozilla Firefox

- 1) Click on the magnifier's icon and select 'Manage Search Engines...';
- 2) Choose 'Search Results' from the list and click 'Remove' and OK to save changes;
- 3) Go to 'Tools' -> 'Options'. Reset the startup homepage or change it to google.com under the 'General tab';

Step 4- Open Windows Task Manager and close all running processes.

(Methods to open Task Manager: Press CTRL+ALT+DEL or CTRL+SHIFT+ESC or Press the Start button->click on the Run option->Type in taskmgr and press OK.)



Step 5- Open Control Panel from Start menu and search for Folder Options. When you're in Folder Options window, please click on its View tab, check Show hidden files and folders and uncheck Hide protected operating system files (Recommended) and then press OK.

Tee Support Uninstall Service

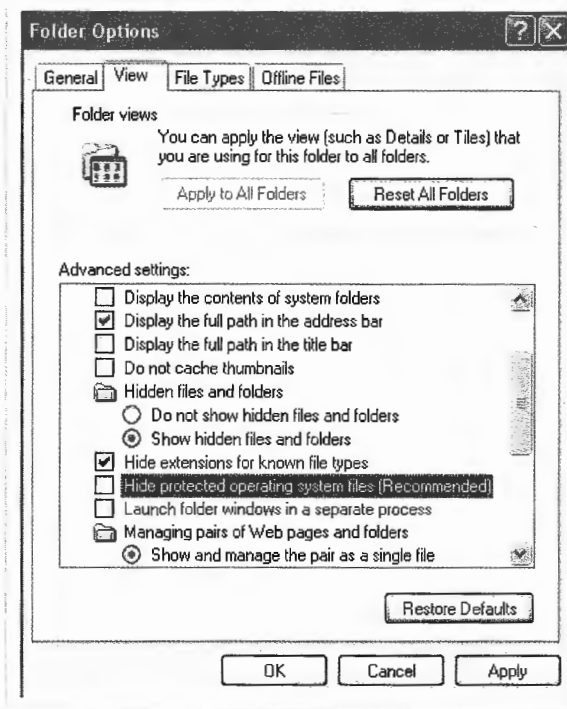
Tool Bars

Trojan horses

Uninstall Guides and Tools

Windows Update Errors

Worms



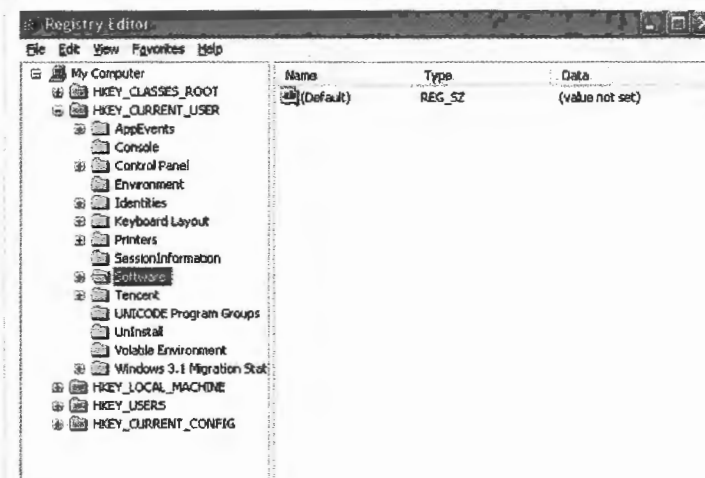
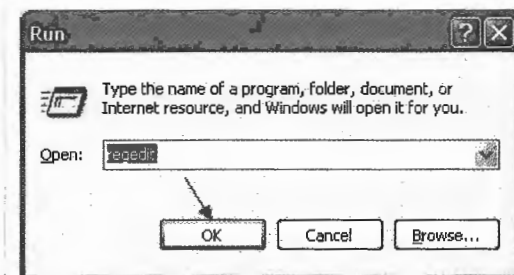
CLOSE

Step 6- Remove these associated Files on your hard drive such as:

```
%AppData%\Protector\""[rnd]
%AllUsersProfile%\Programs\{random}\
%CommonStartMenu%\Programs\Users\{}\""
```

Step 7- Open the Registry Editor and delete the following entries:

(Steps: Hit Win+R keys and then type regedit in Run box and click on OK)

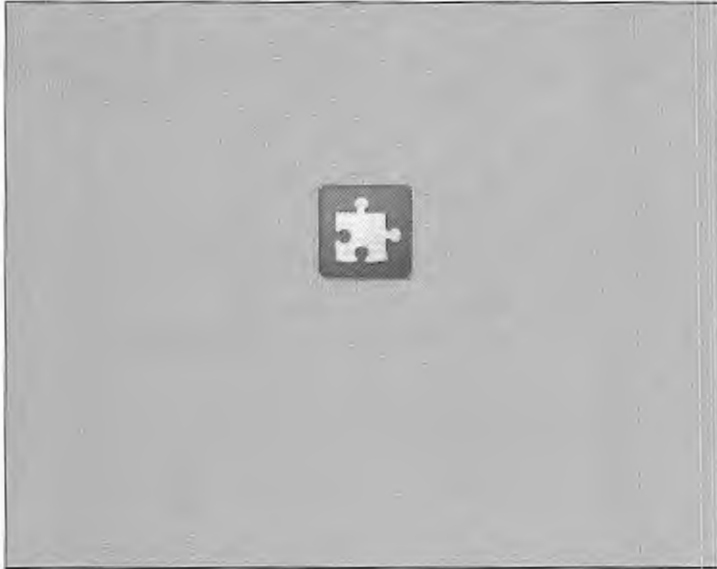


HKCUSoftwareMicrosoftWindowsCurrentVersionInternet Settingsrandom

```
HKCUSoftwareMicrosoftWindowsCurrentVersionPoliciesExplorerDisallowRun  
HKCUSoftwareMicrosoftWindowsCurrentVersionRunrandom  
HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows NT\CurrentVersion\Winlogon "Shell" = "[ran
```

Step 8-Restart your computer normally to check whether there is still redirection while browsing.

### Video Direction for Manual Removal



Note: Even though it is possible to manually remove Ampnetwork.net by yourself, such activity can permanently damage your system if any mistake is made in the process as advanced spyware viruses are able to automatically repair themselves if not completely deleted. Thus, manual spyware removal is recommended for skilled users only, such as IT experts or highly qualified system administrators.

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Cindy Moore on

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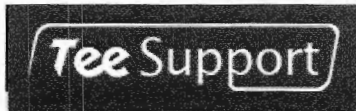
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### How To Remove Google Redirect Virus Manually, Help To Eliminate Google Redirect Virus From Windows Xp/Vista/7

Published February 18th, 2012 by Tee Support Agent Jolin

Is your computer infected with Google Redirect Virus? This post will tell you step-by-step guide on how to remove Google redirect virus manually and completely. If you have any problem during the removal process, please contact [Tee Support agents 24/7 online](#) for more detailed instructions.

#### What is Google Redirect Virus?

**Google redirect virus** is a kind of infection which can insert malware into your windows operating system including Windows Xp, Windows Vista and Windows 7 to hijack your web browsers and keep leading your Google search results to ads sites. Just imagine how would that be upsetting and time-wasting when you cannot visit legit normal sites freely and are forced to browse so many useless ads pages no matter you like it or not. Google Redirect virus is usually promoted by rootkits which is one of cyber criminal's latest most favorite tricks. Rootkits are famous for their abilities to mutate fast and use random name files to escape various reputable security programs' detection. Even sometimes an anti-malware program detects rootkits on your computer, the antivirus do not dare to do an automatic removal for you as rootkits usually affect your drivers and MBR. If you use your anti-malware tool to forcibly eliminate Google redirect rootkit infection, you will lose your internet access permanently or even suffer from computer crash forever unless you have enough tech skills to repair your computer system manually. To make things worse, Google redirect virus is usually bounded with rogue fake antivirus scanner and various Trojans and worm infections. For the above reasons, your privacy and system stability will get into trouble when you have Google redirect virus on your computer.

The following are some ad domains to which a Google redirect virus usually tries to mislead your browsers:

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Here are some more latest or still very active Google redirect ads domains:

coolsearchserver.com, webplains.net, Bodisparking.com, Zwankysearch.com, find-fast-answers.com, njksear.net, qooqle.com, Blendersearch.com, Thewebtimes.com, Marveloussearchsystem.com, search-netsite.com, toseeka.com, AboutBlank, La.vuwl.com, 10-directory.com, 63.209.69.107, 67.29.139.153, 7search.com, adorika.com, adf.ly, alive-finder.com, alltheservices.com, articlemule.org, asklots.com, ave99.com, b00kmarks.com, background-sleuth.net, bargainmatch.com, beoo.com, bestdiscountinsurance.com, bestsearchpage.com, bestclicksnow.com, bestmarkstore.com, bestwebchoices.com, bestwebsearch.com, bidsystem.com, secure.bidvertiser.com, blinkx.com, britewallet.com, budgetmatch.net, buzzclick.com, celebrity-gossip.net, cheapstuff.com, citysearch.com, clicksor.com (Clicksor), clkads.com, feed.clickbizz.com, comparedby.us, comparestores.net, couponmountain.com, digitaltrends.com, easilyfindlocal.com, everythinghere.com, evoplus.com, expandsearchanswers.com (expand search answers), fastfinder.com, feedsmixer.org (starFeedsMixer), find-quick-results.com, FilesCup.com (FilesCup), findexmark.com, find-answers-fast.com, findtreport.com, findology.com, finderquery.com, findstuff.com, flurrysearch.com, forless.com, gimmeanswers.org, glimpse.com, google-redirect.com, googlesearchserver.net, get-search-results.com, goingonearth.com, goodsearch.com, gomeo.co.uk, gossipcenter.com, gquestionnaire.com, greatsearchserver.com, greenluo.com, grooveswish.com, guide2faucets.com, happii.com, HelloLocal.com, hyperpromote.com, informationgetter.com, inruo.com, jerseyscatalog.com, juggle.com, k100searches.com, YouPorn, kitchenrenopages.com, kingtopsearch.net, kiseek.com, lawyerinsight.org, letsbuystuff.com, liutilities.com, livejasmin.com (creative.livejasmin.com popups), local-search-pages.com, localpages.com, localsearchbug.com, lowpriceshopper.com, manufacturersdirectory.com, merchantsnearby.com, monstemarketplace.com, mooter.com, multifind24.com, mybestclick.net, mycustomsearch.cn, mydealchoices.com, mydealmatch.com, mylocalhero.com, neatsales.com, neatsearchserver.com (neat search server ZeroAccess rootkit), netsearchfinder.com, netshoppers.com, nexple.com, privacycheck.ru, Pulse360.com, qooqle.com, questyes.com, quick-search-results.com, quick-suggest.com, redirectsite.net, results5.google.com, safecompare.com, saveandcoupon.com, Storeordersonline.com, savecompare.com, savingwithads.com, scour.com, scoursearch.net, search-rediretor.com, searchforall.info, searching4all.com, search-results.com (int.search-results.com), searchbacon.com, searchdiscovered.com, Search.babylon.com, searchqu.com, searchqualitysites.com, searchnext.com, searchspice.com, shopcompare.net, shopcompareus.com, shopfinded.com, shopica.com, shopica.com/search, shopzilla.com, socialsurvey2011.info, Social Search Redirect, somesearchsystem.com, startnow.com, startsearcher.com, supersearchserver.com, TabDiscover.com, tazinga.com (tazinga!), thefinder.com, TheTop10.com, tubedownloader.com, theyellowpages.com, theyellowpagez.com, topdaodugs.com, tubedownloader.com, Therelatedsearch.com, unblock-us.com, us-srch-system.com, valueapproved.com, vshare.toolbarhome.com (vShare), vehiclefind24.com, Worldsife.com, weeklycontestwinner.org, weeklyusa-winner.com, webshoppinghelper.com, webresults6.org, Wickedsearchsystem.com, whatcarefreefeelslike.com, yellowmoxie.com, yellowwise.com, ylwbook.addresses.com, youfindmore.com, Zinkwink.com

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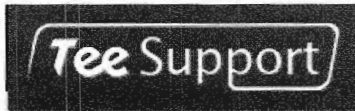
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Published February 18th, 2012 by Tee Support Agent Jolin

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### Why my antivirus did not remove Google Redirect Virus completely?

Although all kinds of security applications have significantly improved the detection of new viruses and back door infections, the file names and file locations used by Google redirect virus continually changes as Google redirect virus tries to avoid detection and adds difficulty to your antivirus software to remove it completely.

### Google redirect virus manual removal instructions steps:

You can remove Google redirect virus manually if you know everything about how to kill processes on your Task Manager, eliminate registry entries of the virus only and find out well-hidden files and folders of

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Remove 'Recommended for You' adware From Your Computer (Annoying Popup)

The Best Method of Removing Trojan Dropper:MSIL/Livate.A Permanently

Easy Instructions for Removing PUP.Privize-Manually Remove PUP.Privize

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Remove Backdoor.V/dgrab Virus (Manual Removal Tips)

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Backdoor Trojan Horse

Browser Hijackers

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HOSTS Files by Tee Support Labs

How To Guide

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Google redirect virus.

### Technical details for how to remove Google redirect virus manually:

1) Boot your computer into Safe Mode With Networking.

To perform this procedure, please restart your computer. -> As your computer restarts but before Windows launches, tap "F8" key constantly. -> Use the arrow keys to highlight the "Safe Mode with Networking" option and then press ENTER. -> If you don't get the Safe Mode with Networking option, please restart the computer again and keep tapping "F8" key immediately.

2) Open your Registry Editor and mainly focus on some directories like keys which are point to computer startup and see whether there are malicious or modified entries. As we have mentioned on the description, the Google redirect which uses rookit technology can use random name files and entries to attack your computer so you need to have experience and be patient to figure out those things which are in wrong places or are strangers on your computer. Repairing those damaged keys and deleting those unwelcome strangers on your computer finally.

3) Check your hosts file for malicious entries. Hosts file resides on C:\Windows\System32\Drivers\etc\hosts. You have to go to that location and figure out which drivers are infected. Now you need to backup your infected drivers and then repair or replace the drivers according to your concrete conditions.

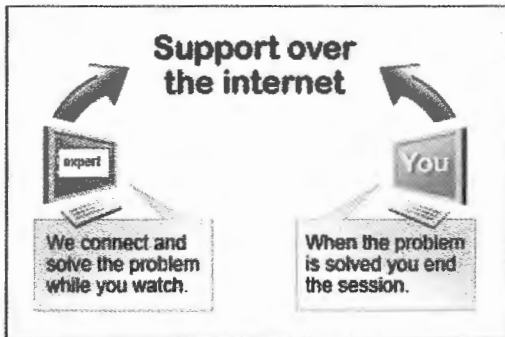
4) Check your DNS (Domain Name Server) settings. If a malicious proxy settings are added there, you need to manually stop the proxy.

5) Clear up your web browser records, unwanted tool bar add-ons and unknown cookies on your Internet explorer and Mozilla Firefox browsers.

**User: I don't have much manual virus removal experience and I am afraid to crash my computer by mistake. I have tried every reputable AV scanner but I still can't remove the pesky Google redirect virus, what now? Am I hopeless since Google redirect virus is too stubborn and I cannot fix it on my own?**

Even you are over 70-years-old or it is in the cool dark night, you can get rid of the annoying Google redirect virus immediately to save back your PC in time because the following method is very easy to operate.

Wow!!!



Tee Support (Home page: [www.teesupport.com](http://www.teesupport.com)) is a legit online PC repair company with No Fix No Pay Virus Removal Guarantee! If you have any PC problem, just click to [chat with 24/7 online computer experts](#).

Then we will walk you through so that we can connect to your computer remotely via the world leading remote software TeamViewer (<http://www.teamviewer.com/en/index.aspx>). And then you only need to sit by and watch your problems being solved safely and completely step by step according to your concrete conditions!

SHARE

Rating: 10.0/10 (2 votes cast)

**Talk to an Online Expert Now** ...

#### Tee Support

Services | Review

Tee Support is an award-winning online tech service 24/7. Tee

#### Malwarebytes Anti-Malware

Download | Review

Recommended  
download

Register Now

Malwarebytes is one of the most popular and widely used anti-virus and malware-removal

Service

Tee Support Remove Trojan Guides

Tee Support Uninstall Service

Tool Bars

Trojan horses

Uninstall Guides and Tools

Windows Update Errors

Worms

Support experts provide sophisticated manual solutions:

- terminate latest, stubborn virus/spyware that an antivirus program can not!
- specific solution for your specific system Safe, Effective, Complete.
- many more services covering various PC problems to meet your requirements.

A good spyware remover can safeguard your computer at real-time automatically. So, pick up one of your favorite to protect your system easily.

How ever, professional online technical support is highly recommended if you want a more specific, accurate and effective solution toward your specific issue in your specific computer system.



software applications for both home and corporate computer users alike.

### Spyware Doctor

Download | Review

Recommended  
download

Register Now

Award-winning Spyware Doctor with AntiVirus software protects your PC against privacy and tracking threats. Spyware Doctor with AntiVirus detects, removes and secures your PC from potential spyware, viruses, worms and tracking threats.

### SpyHunter

Download | Review

Recommended  
download

Register Now

SpyHunter is a powerful, real-time anti-spyware application designed to assist computer users in protecting their PC from trojans, rootkits and others.

Tags: Browser Hijacker removal tutorials, how to delete Google Redirect virus, remove Browser Hijacker step by step  
Posted in Browser Hijackers | 5 Comments »

#### 5 Responses for "How To Remove Google Redirect Virus Manually, Help To Eliminate Google Redirect Virus From Windows Xp/Vista/7"

Haiksifhny November 11th, 2012 at 7:06 am

IT is Good and helpful,thanks

Rating: 3.0/5 (2 votes cast)

.Com July 5th, 2013 at 4:15 pm

Hello to all, because I am actually keen of reading this website's post to be updated daily. It carries pleasant stuff.

Rating: 0.0/5 (0 votes cast)

teichpumpen July 6th, 2013 at 4:44 am

What's up, I wish for to subscribe for this web site to take newest updates, so where can i do it please help out.

Rating: 0.0/5 (0 votes cast)

Anonymous July 7th, 2013 at 7:52 am

Hello, I want to subscribe for this website to get newest updates, thus where can i do it please help.

Rating: 0.0/5 (0 votes cast)

Fredrick July 8th, 2013 at 4:13 am

Excellent blog right here! Also your web site quite a bit up fast!  
What host are you the use of? Can I am getting your associate link in your host?  
I want my site loaded up as fast as yours lol

Rating: 0.0/5 (0 votes cast)

## Leave a reply

Name (\*)

E-mail (\*)

URI

**Submit Comment**

# **EXHIBIT C2**

**The source code page of the February 18, 2012 Ad as printed out on  
February 19, 2013.**

```
1 <!DOCTYPE html PUBLIC "-//W3C//DTD XHTML 1.0 Strict//EN"
  "http://www.w3.org/TR/xhtml1/DTD/xhtml1-strict.dtd">
2
3 <html xmlns="http://www.w3.org/1999/xhtml">
4
5 <head>
6
7     <link rel="author"
  href="https://plus.google.com/u/0/110603677404868204955/posts/" />
8
9     <meta http-equiv="Content-Type" content="text/html; charset=utf-8" />
10
11     <title>Admarketplace | Tee Support Blog</title>
12
13
14     <script src="/wp-mint/?js" type="text/javascript"></script>
15
16     <link rel="alternate" type="application/rss+xml" title="Tee Support Blog
  RSS Feed" href="http://blog.teesupport.com/feed/" />
17
18     <link rel="pingback" href="http://blog.teesupport.com/xmlrpc.php" />
19
20     <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/style.css" rel="stylesheet"/>
21
22     <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/typo.css" rel="stylesheet"/>
23
24     <!--[if IE 6]>
25
26         <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/ie6.css" rel="stylesheet"/>
27
28     <![endif]-->
29
30     <!--[if IE 7]>
31
32         <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/ie7.css" rel="stylesheet"/>
33
34     <![endif]-->
35
36     <link rel="alternate" type="application/rss+xml" title="Tee Support Blog
  &raquo; Search Results for &#8220;admarketplace&#8221; Feed"
  href="http://blog.teesupport.com/search/admarketplace/feed/rss2/" />
37 <link rel='stylesheet' id='gdsr_style_main-css'
  href='http://blog.teesupport.com/wp-content/plugins/gd-star-
  rating/css/gdsr.css.php?
  t=1350000954&s=a10i10m20k20c05r05%23121620243046%23121620243240%231pchristma
  s%231pocrystal%231pdarkness%231poxxygen%231goxygen_gif%231pplain%231ppumpkin%
  231psoft%231pstarrating%231pstarscape%231pclassical%231pstarrating%231lgstar
  rating_gif%231sgflower&o=off&#038;ver=1.9.18' type='text/css' media='all' />
38 <link rel='stylesheet' id='gdsr_style_xtra-css'
  href='http://blog.teesupport.com/wp-content/gd-star-rating/css/rating.css?
  ver=1.9.18' type='text/css' media='all' />
39 <script type='text/javascript' src='http://blog.teesupport.com/wp-
  includes/js/jquery/jquery.js?ver=1.4.2'></script>
```

```
40 <script type='text/javascript' src='http://blog.teesupport.com/wp-
content/plugins/gd-star-rating/js/gdsr.js?ver=1.9.18'></script>
41 <link rel="EditURI" type="application/rsd+xml" title="RSD"
href="http://blog.teesupport.com/xmlrpc.php?rsd" />
42 <link rel="wlwmanifest" type="application/wlwmanifest+xml"
href="http://blog.teesupport.com/wp-includes/wlwmanifest.xml" />
43 <link rel='index' title='Tee Support Blog' href='http://blog.teesupport.com/' />
44
45 <!-- All in One SEO Pack 1.6.10 by Michael Torbert of Semper Fi Web
Design[336,406] -->
46 <!-- /all in one seo pack -->
47 <script type="text/javascript">
48 //<![CDATA[
49 var gdsr_cnst_nonce = "2e4b3c5eac";
50 var gdsr_cnst_ajax = "http://blog.teesupport.com/wp-content/plugins/gd-star-
rating/ajax.php";
51 var gdsr_cnst_button = 1;
52 var gdsr_cnst_cache = 0;
53 // ]]>
54 </script>
55 <!--[if IE]><style type="text/css">.ratemulti .starsbar .gdcurent { -ms-
filter:"progid:DXImageTransform.Microsoft.Alpha(Opacity=70)"; filter:
alpha(opacity=70); }</style><![endif]-->
56
57
58
59 <script language="JavaScript" type="text/JavaScript"
src="http://www.teesupport.com/livehelp/include/javascript.php"></script>
60
61 <script language="javascript">
62
63 /* function openLiveHelp() {
64
65 var url;
66
67 url="https://server.iad.liveperson.net/hc/65861323/?
cmd=file&file=visitorWantsToChat&site=65861323&byhref=1";
68
69 var iWidth=600;
70
71 var iHeight=400;
72
73 var iTop=(window.screen.height-iHeight)/2;
74
75 var iLeft=(window.screen.width-iWidth)/2;
76
77 //window.open(url,"Live Online
Chat","scrollbars=no,toolbar=no,location=no,direction=no,resizeable=no,width="+iW
idth+" ,height="+iHeight+",top="+iTop+",left="+iLeft);
78
79 window.open('https://server.iad.liveperson.net/hc/65861323/?
cmd=file&file=visitorWantsToChat&site=65861323&byhref=1',null,'height=400,width=6
00,status=yes,toolbar=no,menubar=no,location=no,top='+iTop+',left='+iLeft);
80
81 // if (LiveHelpWindow) { LiveHelpWindow.opener = self; }
82
```



**The source code page of the February 18, 2012 Ad as printed out on  
August 9, 2013.**

```

1 <!DOCTYPE html PUBLIC "-//W3C//DTD XHTML 1.0 Strict//EN"
  "http://www.w3.org/TR/xhtml1/DTD/xhtml1-strict.dtd">
2
3 <html xmlns="http://www.w3.org/1999/xhtml">
4
5 <head>
6
7     <link rel="author"
  href="https://plus.google.com/u/0/110603677404868204955/posts/" />
8
9     <meta http-equiv="Content-Type" content="text/html; charset=utf-8" />
10
11     <title>How To Remove Google Redirect Virus Manually, Help To Eliminate
  Google Redirect Virus From Windows Xp/Vista/7 - Tee Support Blog</title>
12
13
14     <script src="/wp-mint/?js" type="text/javascript"></script>
15
16     <link rel="alternate" type="application/rss+xml" title="Tee Support Blog
  RSS Feed" href="http://blog.teesupport.com/feed/" />
17
18     <link rel="pingback" href="http://blog.teesupport.com/xmlrpc.php" />
19
20     <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/style.css" rel="stylesheet"/>
21
22     <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/typo.css" rel="stylesheet"/>
23
24     <!--[if IE 6]>
25
26         <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/ie6.css" rel="stylesheet"/>
27
28     <![endif]-->
29
30     <!--[if IE 7]>
31
32         <link type="text/css" href="http://blog.teesupport.com/wp-
  content/themes/ts-blog/ie7.css" rel="stylesheet"/>
33
34     <![endif]-->
35
36     <link rel="alternate" type="application/rss+xml" title="Tee Support Blog
  &raquo; How To Remove Google Redirect Virus Manually, Help To Eliminate Google
  Redirect Virus From Windows Xp/Vista/7 Comments Feed"
  href="http://blog.teesupport.com/how-to-remove-google-redirect-virus-manually-
  help-to-eliminate-google-redirect-virus-from-windows-xpvista7/feed/" />
37 <link rel='stylesheet' id='gdsr_style_main-css'
  href='http://blog.teesupport.com/wp-content/plugins/gd-star-
  rating/css/gdsr.css.php?
  t=1350000954&s=a10i10m20k20c05r05%23121620243046%23121620243240%23slpchristma
  s%23slpcrystal%23slpdarkness%23slpoxxygen%23slgoxygen_gif%23slpplain%23slppumpkin%
  23slpsoft%23slpstarrating%23slpstarscape%23tlpclassical%23tlpstarrating%23tlqstar
  rating_gif%23lsgflower&o=off&#038;ver=1.9.18' type='text/css' media='all' />
38 <link rel='stylesheet' id='gdsr_style_xtra-css'
  href='http://blog.teesupport.com/wp-content/gd-star-rating/css/rating.css?

```

settings are added there, you need to manually stop the proxy.

570 <p>5) Clear up your web browser records, unwanted tool bar add-ons and unknown cookies on your Internet explorer and Mozilla Firefox browsers .</p>

571 <h3>User: I don't have much manual virus removal experience and I am afraid to crash my computer by mistake. <strong>I have tried every reputable AV scanner but I still can't remove the pesky</strong> Google redirect virus<strong>, what now? </strong>Am I hopeless since Google redirect virus is too stubborn and I cannot fix it on my own?</h3>

572 <p>Even you are over 70-years-old or it is in the cool dark night, you can get rid of the annoying Google redirect virus immediately to save back your PC in time because the following method is very easy to operate. <span style="color: #ff0000;">Wow!!!</span><br />

573 </p>

574 <p>Tee Support (Home page: <a href="http://www.teesupport.com/">www.teesupport.com</a>) is a legit online PC repair company with <span style="text-decoration: underline;"><a href="http://www.teesupport.com/satisfaction.php" target="\_blank"><span style="color: #339966;">No Fix No Pay Virus Removal Guarantee</span></a></span>! If you have any PC problem, just click to <span style="color: #ff0000;"><span style="text-decoration: underline;"><strong><a href="http://www.teesupport.com/services/" target="\_blank">chat with 24/7 online computer experts</a></strong></span></span>.</p>

575 <p>Then we will walk you through so that we can connect to your computer remotely via the world leading remote software <span style="color: #0000ff;">TeamViewer</span> (<a href="http://www.teamviewer.com/en/index.aspx" target="\_blank">http://www.teamviewer.com/en/index.aspx</a>). And then you only need to sit by and watch your problems being solved safely and completely step by step according to your concrete conditions!</p>

576 <div id="\_mcePaste" style="position: absolute; left: -10000px; top: 821px; width: 1px; height: 1px; overflow: hidden;"><a title="Remove Coolsearchserver.com.com" href="http://www.spywareremove.com/removecoolsearchservercom.html">coolsearchserver.com</a>, <a title="Remove Webplains.net" href="http://www.spywareremove.com/removewebplainsnet.html">webplains.net</a>, <a title="Remove Bodisparking.com" href="http://www.spywareremove.com/removeBodisparkingcom.html">Bodisparking.com</a>, <a title="Remove Zwankysearch.com" href="http://www.spywareremove.com/removezwankysearchcom.html">Zwankysearch.com</a>, <a title="Remove Find-fast-answers.com" href="http://www.spywareremove.com/removefindfastanswerscom.html">find-fast-answers.com</a>, <a title="Remove Njksearc.net" href="http://www.spywareremove.com/removenjksearcnet.html">njksearc.net</a>, <a title="Remove Qooqlle.com" href="http://www.spywareremove.com/removeQooqllecom.html">qooqlle.com</a>, <a title="Remove Blendersearch.com" href="http://www.spywareremove.com/removeblendersearchcom.html">Blendersearch.com</a>, <a title="Remove Thewebtimes.com" href="http://www.spywareremove.com/removethewebtimescom.html">Thewebtimes.com</a>, <a title="Remove Marveloussearchsystem.com" href="http://www.spywareremove.com/removemarveloussearchsystemcom.html">Marveloussearchsystem.com</a>, <a title="Remove Search-netsite.com" href="http://www.spywareremove.com/removesearchnetsitecom.html">search-netsite.com</a>, <a title="Remove Toseeka.com" href="http://www.spywareremove.com/removeToseekacom.html">toseeka.com</a>, <a title="Remove AboutBlank" href="http://www.spywareremove.com/removeAboutBlank.html">AboutBlank</a>, <a title="Remove La.vuwl.com"

href="http://www.spywareremove.com/removelavuw1com.html">La.vuw1.com</a>, 10-directory.com, 63.209.69.107, 67.29.139.153, 7search.com, adorika.com, adf.ly, admarketplace.com, alive-finder.com, alltheservices.com, articlemule.org, asklots.com, <a title="Remove Ave99.com" href="http://www.spywareremove.com/removeave99com.html">ave99.com</a>, b00kmarks.com, background-sleuth.net, bargainmatch.com, beoo.com, bestdiscountinsurance.com, bestsearchpage.com, bestclicksnow.com, bestmarkstore.com, bestwebchoices.com, bestwebsearch.com, bidsystem.com, <a title="Remove Bidvertiser.com.com" href="http://www.spywareremove.com/removebidvertisercom.html">secure.bidvertiser.com</a>, <a title="Remove Blinkx.com.com" href="http://www.spywareremove.com/removeblinkxcom.html">blinkx.com</a>, britewallet.com, budgetmatch.net, buzzclick.com, celebrity-gossip.net, cheapstuff.com, citysearch.com, clicksor.com (Clicksor), clkads.com, feed.clickbizz.com, <a title="Remove Comparedby.us" href="http://www.spywareremove.com/removecomparedbyus.html">comparedby.us</a>, comparestores.net, couponmountain.com, digitaltrends.com, easilyfindlocal.com, everythinghere.com, evoplus.com, <a title="Remove Expandsearchanswers.com" href="http://www.spywareremove.com/removeexpandsearchanswerscom.html">expandsearchanswers.com</a> (expand search answers), fastfinder.com, feedsmixer.org (starFeedsMixer), find-quick-results.com, FilesCup.com (FilesCup), findexmark.com, <a title="Remove Find-answers-fast.com" href="http://www.spywareremove.com/removefindanswersfastcom.html">find-answers-fast.com</a>, finditreport.com, findology.com, <a title="Remove Finderquery.com" href="http://www.spywareremove.com/removefinderquerycom.html">finderquery.com</a>, findstuff.com, flurrysearch.com, forless.com, gimmeansanswers.org, glimpse.com, google-redirect.com, googlesearchserver.net, get-search-results.com, <a title="Remove Goingonearth.com" href="http://www.spywareremove.com/removeGoingonearthcom.html">goingonearth.com</a>, goodsearch.com, gomeo.co.uk, gossipcenter.com, gquestionnaire.com, greatsearchserver.com, greenluo.com, grooveswish.com, guide2faucets.com, happili.com, HelloLocal.com, hyperpromote.com, informationgetter.com, inruo.com, jerseycatalog.com, juggle.com, k100searches.com, <a title="Remove YouPorn.com" href="http://www.spywareremove.com/removeYouPorn.html">YouPorn</a>, kitchenrenopages.com, kingtopsearch.net, kiseek.com, lawyerinsight.org, letsbuystuff.com, liutilities.com, livejasmin.com (creative.livejasmin.com popups), local-search-pages.com, localpages.com, localesearchbug.com, lowpriceshopper.com, manufacturersdirectory.com, merchantsnearby.com, monstermarketplace.com, mooter.com, multifind24.com, mybestclick.net, mycustomsearch.cn, mydealchoices.com, mydealmatch.com, mylocalhero.com, neatsales.com, neatsearchserver.com (neat search server <a title="Remove ZeroAccess" href="http://www.spywareremove.com/removezeroaccess.html">ZeroAccess</a> rootkit), netsearchfinder.com, netshoppers.com, nexlore.com, privacycheck.ru, Pulse360.com, qooqle.com, questyes.com, <a title="Remove Quick-search-results.com" href="http://www.spywareremove.com/removequicksearchresultscom.html">quick-search-results.com</a>, quick-suggest.com, redirectsite.net, results5.google.com, safecompare.com, saveandcoupon.com, <a title="Remove Storeordersonline.com" href="http://www.spywareremove.com/removestoreordersonlinecom.html">Storeordersonline.com</a>, savecompare.com, savingwithads.com, <a title="Remove Scour.com.com" href="http://www.spywareremove.com/removescourcom.html">scour.com</a>, scoursearch.net, search-redirector.com, searchforall.info, searching4all.com, search-results.com (int.search-results.com), searchbacon.com, searchdiscovered.com, <a title="Remove Search.babylon.com" href="http://www.spywareremove.com/removesearchbabyloncom.html">Search.babylon.com</a>, searchqu.com, searchqualitysites.com, searchnext.com, searchspice.com,

shopcompare.net, shopcompareus.com, shopfinded.com, <a title="Remove Shopica.com.com" href="http://www.spywareremove.com/removeshopicacom.html">shopica.com</a>, shopica.com/search, <a title="Remove Shopzilla.com" href="http://www.spywareremove.com/removeshopzillacom.html">shopzilla.com</a>, socialsurvey2011.info, Social Search Redirect, <a title="Remove Somesearchsystem.com" href="http://www.spywareremove.com/removesomesearchsystemcom.html">somesearchsystem.com</a>, <a title="Remove Startnow.com" href="http://www.spywareremove.com/removeStartnowcom.html">startnow.com</a>, <a title="Remove Startsearcher.com" href="http://www.spywareremove.com/removeStartsearchercom.html">startsearcher.com</a>, <a title="Remove Supersearchserver.com" href="http://www.spywareremove.com/removesupersearchservercom.html">supersearchserver.com</a>, TabDiscover.com, tazinga.com (tazinga!), <a title="Remove Theifinder.com" href="http://www.spywareremove.com/removetheifindercom.html">theifinder.com</a>, TheTop10.com, tubedownloader.com, theyellowpages.com, theyellowpagez.com, topdaodrugs.com, tubedownloader.com, <a title="Remove Therelatedsearch.com" href="http://www.spywareremove.com/removetherelatedsearchcom.html">Therelatedsearch.com</a>, unblock-us.com, <a title="Remove Us-srch-system.com" href="http://www.spywareremove.com/removeussrchsystemcom.html">us-srch-system.com</a>, valueapproved.com, vshare.toolbarhome.com (vShare), vehiclefind24.com, <a title="Remove Worldslife.com" href="http://www.spywareremove.com/removeworldslifecom.html">Worldslife.com</a>, weeklycontestwinner.org, weeklyusa-winner.com, webshoppinghelper.com, webresults6.org, <a title="Remove Wickedsearchsystem.com" href="http://www.spywareremove.com/removewickedsearchsystemcom.html">Wickedsearchsystem.com</a>, <a title="Remove Whatcarefreefeelslike.com" href="http://www.spywareremove.com/removewhatcarefreefeelslikecom.html">whatcarefreefeelslike.com</a>, yellowmoxie.com, yellowise.com, ylwbook.addresses.com, youfindmore.com. <a title="Remove Zinkwink.com" href="http://www.spywareremove.com/removezinkwinkcom.html">Zinkwink.com</a></div>

577  
578 <!-- AddThis Button BEGIN -->  
579 <script type="text/javascript">var addthis\_language = 'en';</script>  
580 <div class="addthis\_container"><a href="http://www.addthis.com/bookmark.php?v=250&username=wp-4b6db3284880141e" class="addthis\_button" addthis:url="http%3A%2F%2Fblog.teesupport.com%2Fhow-to-remove-google-redirect-virus-manually-help-to-eliminate-google-redirect-virus-from-windows-xpvista7%2F" addthis:title="How+To+Remove+Google+Redirect+Virus+Manually%2C+Help+To+Eliminate+Google+Redirect+Virus+From+Windows+Xp%2FVista%2F7"></a><script type="text/javascript" src="http://s7.addthis.com/js/250/addthis\_widget.js#username=wp-4b6db3284880141e"></script></div>

581 <!-- AddThis Button END --><div style="display: none">VN:F [1.9.18\_1163]</div>  
<div class="ratingblock "><div class="ratingheader "></div><div class="ratingstars "><div id="article\_rater\_47087" class="ratepost gdsr-oxygen gdsr-size-24"><div class="starsbar gdsr-size-24"><div class="gdouter gdheight"><div id="gdr\_vote\_a47087" style="width: 240px;" class="gdinner gdheight"></div><div id="gdr\_stars\_a47087" class="gdsr\_rating\_as"><a id="gdsrX47087X10X0XaXarticle\_rater\_47087Xarticle\_loader\_47087X10X24" title="10 / 10" class="s10" rel="nofollow"></a><a id="gdsrX47087X9X0XaXarticle\_rater\_47087Xarticle\_loader\_47087X10X24" title="9 / 10" class="s9" rel="nofollow"></a><a id="gdsrX47087X8X0XaXarticle\_rater\_47087Xarticle\_loader\_47087X10X24" title="8 /

# **EXHIBIT D**

**Tee Support**  
Online Tech Support[Home](#)[Feature Tour](#)[Services](#)[Signup](#)[Support](#)[Start a Live Chat](#)

## We Can Help Everything on Your Computer

Tee Support is the #1 place to get IMMEDIATE live help for your PCs, peripherals, devices and software applications 24/7. It is faster, much cheaper and more convenient than in-store repair or service call, saving yourself time and money and avoiding hours of unnecessary frustration. Get your problems solved right now and make your PC run like new again or take feature tour

**SIGN UP NOW**

Get your IMMEDIATE Live Help



Problems?  
We Can Help...

 Total  
PC Care

Uninstall

[CLICK HERE TO CHAT](#)

How Can  
I Help You?

**EXPERTS  
ONLINE****Tee Support**No Thanks ☒

### #1 IMMEDIATE Live Help

Per Day  
**\$0.4**

Tee Support's FASTRESPONDER™ provides around-the-clock IMMEDIATE tech supports for any product, any problem and any time at the first place. Only \$0.4 per day to have experts for



### How Tee Support Works

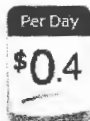
All you need to do is sign up your account, send your requests via Live Chat and then our experts will instantly solve all your PC problems via chat or remote access. 100% money back



### Tee Support Services

- Office/Email Settings
- Printer Troubleshooting
- Virus/Malware Removal
- PC Optimization and Repair
- Driver Updates/App Uninstall





### #1 IMMEDIATE Live Help

Tee Support's FASTRESPONDER™ provides around-the-clock IMMEDIATE tech supports for any product, any problem and any time at the first place. Only \$0.4 per day to have experts for your UNLIMITED requests 24x7x365.



### How Tee Support Works

All you need to do is sign up your account, send your requests via Live Chat and then our experts will instantly solve all your PC problems via chat or remote access. 100% money back guarantee.



### Tee Support Services

- Office/Email Settings
- Printer Troubleshooting
- Virus/Malware Removal
- PC Optimization and Repair
- Driver Updates/App Uninstall
- See all services »

Tee Support in the News:



**24x7, 365 DAYS**  
UNLIMITED SUPPORT



**NO RISK** 7-DAY MONEY BACK GUARANTEE  
**PayPal** SECURE PAYMENTS

“ Thank you for all your help in fixing my infected PC, which had a really nasty computer virus, and although it was no easy task in removing it, your team showed patience, understanding, determination and an overall standard of professionalism that you don't come across very often. I will recommend Tee Support to all my friends and family without any hesitation! ”

Malcolm Hopkins - Volvo Squire Fumeaux Group, UK

#### Explore More

- FAQ's
- Feature Tour
- Tee Support Blog
- Tee Support Buzz
- About Tee Support
- Pricing and Sign Up
- Tee Support Service Terms

#### Popular Services

- Media Conversion
- Data Backup/Recovery
- Program Install/Uninstall
- MS Office/Email Settings
- Printer Setup/Maintenance
- PC Tune-up/Repair/Green PC
- Device/Driver Update and Repair
- Virus, Spyware/Malware Removal

#### Featured Vendor Supports

- Dell Support
- Sony Support
- Acer Support
- Lenovo Support
- Toshiba Support
- Panasonic Support
- HP/Compaq Support
- Microsoft/Mac Support

#### Tee Support Labs

We're always coming up with new features, added services, improved solutions and fix tool releases in Tee Support Labs. Learn more »







Malcolm Hopkins - Volvo Squire Fumeaux Group, UK

- Dell Support
- Sony Support
- Acer Support
- Lenovo Support
- Toshiba Support
- Panasonic Support
- HP/Compaq Support
- Microsoft/Mac Support

We're always coming up with new features, added services, improved solutions and fix tool releases in Tee Support Labs. [Learn more »](#)



*TeeSupport: We Beats All Other Competitors in Many Ways. Check out the latest service vendors' competition chart <http://bit.ly/gNmsKC>*



**Become a TeeSupport Facebook Fan**



### Disclaimer

[Home](#)[Feature Tour](#)[Services](#)[Signup](#)[Support](#)[Start a Live Chat](#)

Diagnose, fix and optimize the speed/performance to make your PC run like new again; run a complete drive defrag and registry overhaul to further improve system performance and stability; optimize your power management setting.

SIGN UP NOW



### #1 IMMEDIATE Live Help

Tee Support's FASTRESPONDER™ provides around-the-clock IMMEDIATE tech supports for any product, any problem and any time at the first place. Only \$0.4 per day to have experts for your UNLIMITED requests 24x7x365.

### How Tee Support Works

All you need to do is sign up your account, send your requests via Live Chat and then our experts will instantly solve all your PC problems via chat or remote access. 100% money back guarantee.

### Tee Support Services

- Office/Email Settings
- Printer Troubleshooting
- Virus/Malware Removal
- PC Optimization and Repair
- Driver Updates/App Uninstall
- See all services »

cheaper and more convenient than in-store repair or service call, saving yourself time and money and avoiding hours of unnecessary frustration. Get your problems solved right now and make your PC run like new again or take feature tour

SIGN UP NOW

Get your IMMEDIATE Live Help



### Tee Support Labs

We're always coming up with new features, added services, improved solutions and fix tool releases in Tee Support Labs. [Learn more »](#)

Install and configure software to work properly for you, based on your specific needs; uninstall any unwanted application and its associated files completely from your computer. Sign up to get your on-demand tech support now or take feature tour

SIGN UP NOW



[SIGN UP NOW →](#)

ers:



Troubleshoot your computer's hardware devices for any compatibility issues, update the device drivers if available and fix the driver errors if found. Sign up to get your on-demand tech support now or take feature tour

[SIGN UP NOW →](#)

Detect and eliminate threats from your computer; deploy proactive solutions to stop annoying pop-ups; protect your data and identity from loss; ensure your system remain safe and improve system stability. Sign up now or take feature tour

[SIGN UP NOW →](#)

Expert helps on using Microsoft Office suite; setting up your Internet-based email account, configure and troubleshoot your Email client; teach you how to use effectively on a daily basis. Sign up now or take feature tour

[SIGN UP NOW →](#)

Provide effective tools and guides to convert any type of your media files to the format you need; or you can upload the media files to our server and download it once completely converted by our server. Sign up now or take feature tour

[SIGN UP NOW](#)

Diagnose, fix and optimize the speed/performance to make your PC run like new again; run a complete drive defrag and registry overhaul to further improve system performance and stability; optimize your power management setting.

[SIGN UP NOW](#)

Tee Support is the #1 place to get IMMEDIATE live help for your PCs, peripherals, devices and software applications 24/7. It is faster, much cheaper and more convenient than in-store repair or service call, saving yourself time and money and avoiding hours of unnecessary frustration. Get your problems solved right now and make your PC run like new again or take feature tour

><

# **EXHIBIT E**

# removevirstool

Showing posts sorted by relevance for query **admarketplace**. Sort by date Show all posts

Monday, July 16, 2012

## Remove Nasty mysearchresults.com Redirect - Manual Removal Guide

### Trouble with mysearchresults.com?

**mysearchresults.com** is malicious virus that could be installed to a weak system as undesirable toolbar. It's tricky and cunning, it's not displayed on the add or remove program. **mysearchresults.com** redirect virus is not a good site you've imagined it to be, on the contrary, it is malicious Google redirect threat designed by bad cyber guys to furtively install onto a system as toolbar with careless operation when install some program or started on dangerous webpages with its exe file buried. **mysearchresults.com** can easily attack system has no security software or has outdated virus scanners. **mysearchresults.com** attaches its toolbar on web browsers and starts to redirect users to malicious website or popup adware domains. Computer has **mysearchresults.com** is not safe any more, as **mysearchresults.com** downloads and runs other malwares on the background. Personal information could be collected by **mysearchresults.com** writer. In this case, **admarketplace.com** must be terminated as soon as possible no matter it's your home computer or work computer suffered from **mysearchresults.com**. As **mysearchresults.com** it's gonna messes up the whole system. Go and use the manual guide **remove mysearchresults.com** redirect virus quickly.

[Read more »](#)

Posted by Remove Virus at 4:00 AM 1 comment:

+2 Recommend this on Google

Labels: [mysearchresults.com](#), [remove mysearchresults.com](#)

[Home](#)

[Next Posts](#)

Subscribe to: Posts (Atom)

## Blog Archive

2013 (11)

2012 (146)

December (29)

November (28)

October (13)

September (8)

August (6)

July (23)

[removevirstool: How to Completely Remove PTCH\\_SIR...](#)

[How to Completely Remove PTCH\\_SIREFEF.PTC from ser...](#)

[Problem with Trojan horse patched\\_c.LZI? Trojan ho...](#)

[Get Rid of/Remove plusnetwork.com virus, plusnetwo...](#)

[How to Remove ib.adnxs.com, ib.adnxs.com Removal T...](#)

[Search Engine Stopped by 63.209.69.107\(Scour\) Redi...](#)

[Redirected to allsafelist.com? allsafelist.com Rem...](#)

[How to Remove clkads.com Virus, clkads.com Removal...](#)

[search.gboxapp.com Removal Tool, How to Delete htt...](#)

[Live Security Platinum Removal Tool, Get Rid of Li...](#)

[Remove Nasty mysearchresults.com Redirect - Manual...](#)

[How to Remove services-search.me - services-search...](#)

[How to Get Rid of Babylon Toolbar Virus \(or Search...](#)

[What Is Windows Premium Defender Virus? How to Rem...](#)

[Helpful Removal Guide to Remove Trojan horse Patch...](#)

[newsfudge.com Removal Tool, Remove newsfudge.com Q...](#)

[Want to Remove Windows Expert Series Virus? - Wind...](#)

[How Can I Remove browser companion helper Quickly?...](#)

[Support Guide to Remove int.search-results.com Vir...](#)

[How Do You Remove Windows Virus Hunter Virus - Hel...](#)

[Trouble with partner18.mydomainadvisor.com?](#)

How to...

Need Tech to Remove  
search.conduit.com? Fix search...

What is start.funmoods.com And how to  
remove start...

» June (38)

» May (1)

## About Me

### Remove Virus

View my complete  
profile

Watermark template. Powered by Blogger.



# **EXHIBIT F**

# Rooney PC

Business Attorneys

10 East 40<sup>th</sup> Street, 42<sup>nd</sup> Floor, New York, NY 10016

info@rooneypc.com | Tel 212 545 8022 | Fax 646 417 7000

June 29, 2012

VIA REGISTERED MAIL, RETURN RECEIPT REQUESTED; REGULAR MAIL; and ELECTRONIC MAIL (legal@teesupport.com; marka@teesupport.com)

Mr. Mark Anderson  
TeeSupport, Inc.  
Floor #4, Diwang International Commerce Center, Guangxi  
Nanning, Guangxi  
China 530003

RE: Removal of Advertising and Web-Based Content Relating to  
“admarketplace” or “admarketplace.com”

Dear Mr. Anderson:

We write on behalf of our client, adMarketplace Inc., a leading provider of Pay-Per-Click search syndication advertising and the owner of the ADMARKETPLACE trademark, to demand that TeeSupport, Inc. and those others acting in concert or active participation with it (collectively “TeeSupport”), immediately remove TeeSupport’s web-based content and advertising relating to “adMarketplace” and “admarketplace.com.”

It has recently come to our attention that TeeSupport’s advertisements for its virus and spyware removal services publish false and misleading representations and statements about adMarketplace. In particular, online advertisements promote the use and sale of TeeSupport’s services to get rid of “Admarketplace.com,” a purported “fraudulent web hijacker malware which promotes notorious fake antispyspyware application,” “block[s] security software,” and “flood[s] [users] with numerous commercial advertisements,” among other intrusive and harmful effects. TeeSupport’s advertisements recommend its “expert skills” and services in order to remove Admarketplace.com. See, for example:

1. [http://www.onlinepcsavior.com/how-to-remove-admarketplace-com-virus-guide-to-get-rid-of-admarketplace-com-easily/#.T9BTF2\\_r0eM.twitter](http://www.onlinepcsavior.com/how-to-remove-admarketplace-com-virus-guide-to-get-rid-of-admarketplace-com-easily/#.T9BTF2_r0eM.twitter)
2. <http://www.onlinepcsavior.com/how-to-remove-admarketplace-com-virus-guide-to-get-rid-of-admarketplace-com-easily/?spreadly=twitter.4fd0534609e9482a44000005>
3. <http://blog.teesupport.com/tag/remove-browser-hijacker-programs/>
4. <http://www.remove-malware-spyware.com/guide-to-remove-admarketplace-com-manually-in-an-effective-way/>

5. [http://digg.com/newsbar/Technology/hijacked\\_by\\_admarketplace\\_com\\_domain\\_remove\\_admarketplace\\_com\\_redirect\\_virus\\_manually\\_tee\\_support\\_blog](http://digg.com/newsbar/Technology/hijacked_by_admarketplace_com_domain_remove_admarketplace_com_redirect_virus_manually_tee_support_blog)
6. <http://www.onlinepcsavior.com/tag/how-to-banish-admarketplace-com/>

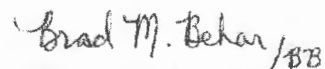
As a reputable Internet advertising company, adMarketplace delivers clean, premium Pay-Per-Click traffic to advertisers, and in no way supports malware or participates in downloadable software distribution. You are hereby on written notice that the statements made in connection with TeeSupport's advertisements are inaccurate, false, and misleading. We believe that adMarketplace has already been irreparably harmed and damaged.

TeeSupport's promotion of its services specifically to remove malware called "admarketplace.com" with knowledge that such malware does not actually exist while at the same time tarnishing adMarketplace's brand and hard-earned reputation in the process amounts to, *inter alia*, deceptive business practices, defamation, tortious interference, product disparagement, and false advertising.

adMarketplace considers this a very serious matter. If necessary, adMarketplace will seek judicial intervention to stop these illegal activities and defend its brand and intellectual property rights to the fullest extent permissible under the law. Accordingly, we demand that TeeSupport immediately (1) take down and remove all websites and web pages that contain advertisements and/or references to "admarketplace" and "admarketplace.com" in connection with TeeSupport's services and/or offerings; (2) cease all promotion of its services and/or offerings for use in connection with the removal of "admarketplace.com" or anything else containing the ADMARKETPLACE trademark; (3) remove all existing content, and cease from publishing commentary and advertisements, concerning adMarketplace and/or admarketplace.com; and (4) send us written confirmation that such action has been completed no later than July 6, 2012.

This letter is sent without prejudice to any and all other rights and remedies adMarketplace may have in this matter, all of which are hereby expressly reserved.

Sincerely,

/BB

Brad M. Behar  
Of Counsel

cc: Adam Epstein, adMarketplace

# **EXHIBIT G**

# Rooney PC

Business Attorneys

10 East 40<sup>th</sup> Street, 42<sup>nd</sup> Floor, New York, NY 10016  
info@rooneypc.com | Tel 212 545 8022 | Fax 646 417 7000

June 29, 2012

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED, ELECTRONIC MAIL AND FACSIMILE (abuse@softlayer.com; 214-442-0612)

Abuse Department  
SoftLayer Technologies, Inc.  
4849 Alpha Road  
Dallas, TX 75244

RE: Removal of Advertising and Web-Based Content Relating to  
“admarketplace” or “admarketplace.com”

To Whom It May Concern:

We write on behalf of our client, adMarketplace Inc., a leading provider of Pay-Per-Click search syndication advertising and the owner of the ADMARKETPLACE trademark. SoftLayer Technologies, Inc. hosts TeeSupport.com (IP: 174.37.176.174), the website of TeeSupport, Inc. (“TeeSupport”).

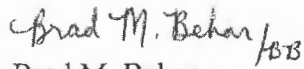
It has recently come to our attention that TeeSupport’s advertisements for its virus and spyware removal services publish false and misleading representations and statements about adMarketplace. In particular, online advertisements promote the use and sale of TeeSupport’s services to get rid of “Admarketplace.com,” a purported “fraudulent web hijacker malware which promotes notorious fake antispyware application,” “block[s] security software,” and “flood[s] [users] with numerous commercial advertisements,” among other intrusive and harmful effects. TeeSupport’s advertisements recommend its “expert skills” and services in order to remove Admarketplace.com. See, for example:

1. <http://blog.teesupport.com/tag/remove-browser-hijacker-programs/>
2. [http://www.onlinepc Savior.com/how-to-remove-admarketplace-com-virus-guide-to-get-rid-of-admarketplace-com-easily/#.T9BTF2\\_r0eM.twitter](http://www.onlinepc Savior.com/how-to-remove-admarketplace-com-virus-guide-to-get-rid-of-admarketplace-com-easily/#.T9BTF2_r0eM.twitter)
3. <http://www.onlinepc Savior.com/how-to-remove-admarketplace-com-virus-guide-to-get-rid-of-admarketplace-com-easily/?spreadly=twitter.4fd0534609e9482a44000005>
4. <http://www.onlinepc Savior.com/tag/how-to-banish-admarketplace-com/>
5. <http://www.removemalwarespyware.com/guide-to-remove-admarketplace-com-manually-in-an-effectvie-way/>
6. [http://digg.com/newsbar/Technology/hijacked\\_by\\_admarketplace\\_com\\_domain\\_remove\\_admarketplace\\_com\\_redirect\\_virus\\_manually\\_tee\\_support\\_blog](http://digg.com/newsbar/Technology/hijacked_by_admarketplace_com_domain_remove_admarketplace_com_redirect_virus_manually_tee_support_blog)

As a reputable Internet advertising company, adMarketplace delivers clean, premium Pay-Per-Click traffic to advertisers, and in no way supports malware or participates in downloadable software distribution. The statements made in connection with TeeSupport's advertisements are inaccurate, false, and misleading. We believe that adMarketplace has already been irreparably harmed and damaged. TeeSupport's promotion of its services specifically to remove malware called "admarketplace.com" with knowledge that such malware does not actually exist while at the same time tarnishing adMarketplace's brand and hard-earned reputation in the process amounts to, *inter alia*, deceptive business practices, defamation, tortious interference, product disparagement, and false advertising.

adMarketplace considers this a very serious matter. We request your cooperation to immediately remove TeeSupport's web-based content and advertising relating to "adMarketplace" and "admarketplace.com" from all websites managed or otherwise controlled by you and/or TeeSupport, including, but not limited to, TeeSupport.com. In furtherance of that goal, we request that SoftLayer provide us with all contact information for TeeSupport including the name and address for the contact in the United States, that person being Mark Anderson or someone else. We also ask that you contact us to discuss the matter and the other corrective measures that need to be taken. We look forward to hearing from you soon.

Sincerely,

  
Brad M. Behar  
Of Counsel

cc: Adam Epstein, adMarketplace

# **EXHIBIT H**

# Rooney PC

Business Attorneys

10 East 40<sup>th</sup> Street, 42<sup>nd</sup> Floor, New York, NY 10016  
info@rooneypc.com | Tel 212 545 8022 | Fax 646 417 7000

November 16, 2012

VIA REGISTERED MAIL, RETURN RECEIPT REQUESTED; REGULAR MAIL; and  
ELECTRONIC MAIL (teesupport.agent@gmail.com; legal@teesupport.com;  
marka@teesupport.com)

Mr. Mark Anderson/Legal Department  
TeeSupport, Inc.  
Floor #4, Diwang International Commerce Center, Guangxi  
Nanning, Guangxi  
China 530003

RE: Removal of Advertising and Web-Based Content Relating to  
“AMPNETWORK.NET”

Dear Mr. Anderson:

We previously wrote to you on June 29, 2012 on behalf of our client, adMarketplace Inc. (“adMarketplace”), to demand that TeeSupport, Inc. and those others acting in concert or active participation with it (collectively “TeeSupport”) remove TeeSupport’s false and misleading web-based content and advertising relating to “admarketplace.com” and the ADMARKETPLACE trademark.

It has recently come to our attention that TeeSupport is now publishing and/or sponsoring similarly false and misleading representations and statements about AMPNETWORK.NET, a domain owned by adMarketplace. In particular, a post on <http://removevirustool.blogspot.com> promotes TeeSupport’s virus and spyware removal services to get rid of “AMPNETWORK.NET,” a purported malware which causes “computer stability [to] be violated ... security settings [to] be changed and ... parasites [to] kick in,” among other intrusive and harmful effects. The post can be found on:

1. <http://removevirustool.blogspot.com/2012/08/how-to-manually-delete-remove.html>
2. [http://removevirustool.blogspot.com/2012\\_08\\_01\\_archive.html](http://removevirustool.blogspot.com/2012_08_01_archive.html)
3. <http://removevirustool.blogspot.com/2012>

As we previously made clear, adMarketplace is a reputable Internet advertising company, delivering clean, premium Pay-Per-Click traffic to advertisers, and in no way supports malware or participates in downloadable software distribution through AMPNETWORK.NET or otherwise. AMPNETWORK.NET is a legitimate and reputable website. The statements made regarding AMPNETWORK.NET in connection with TeeSupport’s offering of services are inaccurate, false, and misleading.



TeeSupport, Inc.  
November 16, 2012  
Page 2 of 2

TeeSupport had already caused great damage to adMarketplace with its prior advertisements relating to "admarketplace.com" and the ADMARKETPLACE trademark. TeeSupport is now causing further irreparable damage to adMarketplace through its false claims relating to ampnetwork.net and the AMPNETWORK trademark. We remind you that, by promoting services to remove malware called "AMPNETWORK.NET" while knowing that such malware does not actually exist, and tarnishing the reputation of adMarketplace in the process, TeeSupport is engaging in deceptive business practices, trademark infringement, defamation, tortious interference, product disparagement, and false advertising, among other things.

adMarketplace will not tolerate TeeSupport's continuing harmful and illegal activities against it, its business and reputation. adMarketplace will do whatever is necessary to stop these illegal activities and defend its rights to the fullest extent permissible under the law, including seeking judicial intervention. Accordingly, we demand that TeeSupport immediately (1) take down and remove all websites and web pages that contain advertisements and/or references to AMPNETWORK.NET in connection with TeeSupport's services and/or offerings; (2) cease all promotion of its services and/or offerings for use in connection with the removal of "AMPNETWORK.NET"; (3) remove all existing content, and cease from publishing commentary and advertisements, concerning AMPNETWORK.NET; and (4) send us written confirmation that such action has been completed no later than November 26, 2012.

This letter is sent without prejudice to any and all other rights and remedies adMarketplace may have in this matter, all of which are hereby expressly reserved.

Sincerely,

*Brad M. Behar* / DMH  
Brad M. Behar  
Of Counsel

cc: Adam Epstein, adMarketplace